CSR implementation user guide

2016

Dear Supplier,

This guide aims at helping your company implement CSR actions in the fields of Environment, Labor Practices, Fair Business Practices and Sustainable Procurement, by focusing on your management system.

How is this guide composed?

This guide includes:
- This very introduction,
- A focus on management systems,
- A focus on CSR domains,
- Instructions: how to use the guide?,
- 21 improvement areas datasheets: 6 for Environment, 7 for Labor Practices, 4 for Fair Business Practices, 4 for Sustainable Procurement,
- Appendixes on governance and improvement plans.

Each improvement area datasheet aims at:
- Helping you understand the benefits of such practices,
- Giving an accurate and recognized definition of the concept,
- Providing guidance on how to proceed (what should be addressed and how),
- Showing examples and explaining what is satisfactory or not,
- Tailoring recommendations according to your company's size, location, and sector with symbols.

We hope that it will be a useful resource for your teams. We remain at your disposal for any clarification and are happy to hear any feedback that you may suggest.

Best regards,

Nokia's responsible procurement team

CONTENTS

You company has been assessed on its management practices regarding CSR. Indeed, EcoVadis rating model is based on management systems and proceeds to a documentary audit to check your policies, actions and results. The assessment is tailored according to your profile: size, location, and sector.

Definition: "ISO 9000:2000 defines a management system as a 'set of interrelated or interacting elements to establish policy and objectives and to achieve those objectives'. Expanding on this definition, perhaps the clearest interpretation of this is that a business management system is: 'the structure, processes and resources needed to establish an organization's policy and objectives and to achieve those objectives'" (source:http://www.thecqi.org/Knowledge-Hub/Knowledge-portal/Corporate-strategy/Management-systems/)

Most management systems are based on quality methods, including Deming's PDCA, whose goal is to improve company's performance continually.

Plan: first define what is material, mainly through an impact assessment. It will enable to plan objectives, detail commitments and the methods used to reach these objectives (e.g. policy), according to what is material to your company and stakeholders.
Do: implement actions to reach corporate objectives.
Check: make sure that actions are efficient by following KPIs/results.
Act: analyze KPIs to determine new objectives and new actions to reach the objectives according to what's efficient or not.
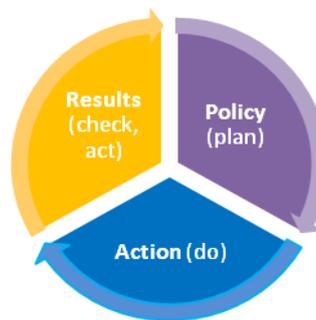
Once **KPIs** are analyzed to see if **actions** are efficient, your start **planning** again, implement **new actions** which lead to **new KPIs**, enabling constant **improvement** of company's performances.

The PDCA is reflected in the EcoVadis methodology. For each domain (Environment, Labor Practices, Fair Business Practices, Sustainable Procurement), your company is rated on Policies, Actions, and Results.

What makes a good policy?

- ➢ **Mission Statements**
  - ▪ The potential **content** is described in each improvement area datasheet and must be tailored according to the size, location and sector of your company.
  - ▪ **Formalization**. A policy is a document aiming at raising awareness among employees and at informing them of the company's objectives. Thus, the company logo, the release date and signature of the management team are expected. What is more, we ask for dedicated responsibilities, so that employees know who to report to in case of questions, and to make sure these policies will be reviewed regularly. In addition, scope of application is mandatory as it shows employees that they are also concerned and their involvement is key factor towards the completion of your objective
- ➢ **Endorsement**. Endorsing external CSR initiatives allows companies to benefit from international or sector-based guidance, as well as to enhance visibility among stakeholders. Such initiatives can encompass several CSR issues (e.g. Global Compact principles), be issue specific (e.g. CDP supply chain program), intergovernmental (e.g. OECD Guidelines for Multinational Enterprises), multi-stakeholder (e.g. AccountAbility), business-led, cross-sector or sector-specific (e.g. EICC, CFSI).

What makes a good action?

- ➢ **Measures**. Measures should address the CSR criteria activated for your company.
- ➢ **Scope.** Measures can be satisfactory, but they need to cover your relevant impact areas and stakeholders. If they don't cover all relevant impact areas and stakeholders, then specify for each measure who and which area are concerned.
- ➢ **Certifications**. External certifications as OHSAS 18 00, ISO 14 001 enable your company to benefit from more credibility.

What makes a good reporting?

- ➢ **KPIs.** Coverage: the KPIs need to cover all major CSR issues according to your size, location and sector. Relevance: they should be structured to reflect your company CSR performance.
- ➢ **360°.** Third-party information on your company CSR performance. Only indisputable items are taken into account in the scoring.

Management system for Small and Medium Enterprises (<50 employees)	Management system for large companies
We understand that it is easier for SMEs to speak to all employees to inform them about the objectives and commitments in a meeting. We still advise SMEs to have a short document summing them up, that can be displayed in the office. Endorsement is good but we will understand if SMEs do not spend resources in this sense as the return on investment will be poor. Actions stand for the item of the management system that is 100% relevant to SMEs, so we really expect SMEs to implement them. Certifications are always appreciated but we will understand that SMEs do not spend resources in this sense as the return on investment will be poor. KPIs are not always relevant when measures only cover 1 person. However, SMEs need to monitor the efficiency of actions like any company. Sustainable development reports are always a good practice, but we understand that SMEs do not spend resources in this sense as the return on investment will be poor.	Please specify the scope of application of your policies and make sure that they are read by all employees. Endorsement is highly recommended. Actions need to be applied in all impact areas and for all impacted stakeholders whenever possible. Pay close attention to the coverage of your measures. Certifications of management systems are highly desirable. KPIs should be consolidated. We recommend your company to try to aggregate them as much as possible and to have a public sustainable development report, which follows CSR reporting standards like Global Reporting Initiative (GRI).

Focus on CSR domains

Environment

Main stakeholders: customers, local communities (impacted areas and populations), future generations. Environmental impacts happen on the whole life-cycle of the product (good or service).

Your company can have environmental impacts linked to:
Production
- Energy Consumption & GHG
- Materials, Chemicals and Waste
- Water
- Biodiversity
- Local Pollution

Product and service
- Product use
- Product End-of-life
- Customers Health and Safety
- Sustainable Consumption

All companies have environmental impacts but their type and magnitude depend on the company: manufacturing companies have more impacts due to their activities.

Fair Business Practices

Main stakeholders: business-related parties e.g. suppliers, customers, competitors. Key employees concerned in the company: salesmen, buyers, managers.

Fair Business Practices relates to ethics. Companies are expected to comply with all local laws and international standards, to respect competition frameworks and to be transparent.

Your company can have ethics impacts linked to:
- Corruption and bribery
- Anticompetitive practices
- Data privacy

Pay close attention if you are located in a risky country.

Labor Practices

Main stakeholders: anyone working in and for the company

Labor practices are about human resources and human rights practices and focus on how organizations manage their impacts towards their employees.

Social impacts are linked to:

- Health and Safety (number 1 priority)
- Working Conditions
- Career Management
- Social Dialogue
- Child and Forced Labor
- Discrimination
- Fundamental Human Rights

All companies are subject to these impacts. Pay close attention to the above topics when located in a risky country.

Sustainable procurement

Main stakeholder: suppliers and subcontractors, any third party selling products (goods or services) to the organization.

Sustainable procurement deals with environmental impacts and labor issues generated from the company's suppliers. The goal is to include environmental, social and ethics criteria in the supply chain to manage CSR risks.

There are two approaches within sustainable procurement.

1) Companies that have a supply chain should require their suppliers to manage their own environmental, social and ethics impacts.
2) Companies that do not have a supply chain should focus on internal use purchases; this means that all companies are concerned.

INSTRUCTIONS: how to use the improvement area datasheets?

Logo of the company. Nokia is the owner of these files

What is included in *Policy* sheets? *(sheets in shades of purple)*

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FAIR BUSINESS PRACTICES POLICY
Back to contents

Name of the file: CSR domain or criteria + management system section (policy, actions or results) and "back to contents" button.

ecoVadis | Improvement areas ⚠

- Claims a policy on responsible marketing/business ethics but no supporting documentation
- No business ethics policies
- Basic ethics policy

WHY A POLICY?

Set clear rules for employees

Provide an ethic framework

Frame explaining the benefits of policies

Main EcoVadis improvement areas that can be addressed with the following recommendations

Reminder: Before drafting the policy, your company should identify the most relevant issues at stake according to its profile. Best practice: set quantitative targets.

Reminder on what needs to be done before writing down the policy

What you can address in your Ethics/Fair Business Practices

Corruption & Bribery
All forms of corruption at work:
- Extortion: demanding a sum of money (or goods) with a threat of harm (physical or business) if demands are not met (source: UK's Serious Fraud Office or SFO).
- Bribery: giving or receiving something of value to influence a transaction (source: Serious Fraud Office, UK).
- Conflict of interest: where an employee has an economic or personal interest in a transaction (source: SFO).
- Gifts and entertainment: gifts and entertainment are defined to mean anything of monetary value, offered or received by clients, potential clients or any other business partners (source: US Office of Government Ethics).
- Fraud: abuse of position, or false representation, or prejudicing someone's rights for personal gain (source: SFO).
- Money laundering: a financial transaction scheme that aims to conceal the identity, source, and destination of illicitly-obtained money (source: Financial Action Task Force or FATF).

Anti-competitive practices
- Bid-rigging: a scheme in which businesses collude so that a competing business can secure a contract for goods or services at a pre-determined price (source: Australian Competition and Consumer Commission or ACCC).
- Price fixing, Limit pricing, Predatory pricing: an agreement among competitors that raises, lowers, or stabilizes prices or competitive terms (source: US Federal Trade Commission or FTC).
- Dumping: the export by a country or company of a product at a price that is lower in the foreign market than the price charged in the domestic market (source: FTC).
- Coercive monopoly: setting the prices and production policies independent of the market, with immunity from competition (source: Organisation for Economic Cooperation and Development or OECD, Investopedia).
- Product tying: illegal arrangement where, in order to buy one product, the consumer must purchase another product that exists in a separate market (source: FTC).
- Dividing territories: agreements between competitors to split markets and not compete with each other (source: money-zine.com).

Data privacy
- Consumer and data protection, privacy, truthfulness of marketing messages
- Intellectual property: refers to creations of the mind, such as inventions; literary and artistic works; designs; and symbols, names and images used in commerce (source: World Intellectual Property Organisation).

EcoVadis criteria and sub-criteria included in this domain

Definition of the sub-criterion with international sources

Don't forget!
- ☐ Dedicated responsibilities
- ☐ Scope of application
- ☐ Policy issue date
- ☐ Logo of the company
- ☐ Signature of the management

Reminder on how to formalize a policy

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What is specific for *Action* sheets? *(sheets in shades of blue)*

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DATA PRIVACY ACTIONS
Back to contents

ecoVadis| Improvement areas ⚠
- No supporting documentation on implemented measures regarding data privacy
- No information on implementation measures regarding data privacy

RISKS MANAGED OPPORTUNITIES
Reputation impacts
Avoid legal claims while strengthening clients' trust

Focus on risks managed and on business opportunities that can be reached through the completion of these actions

🖥 These actions are specifically important for Software firms.

What is data privacy?

What is data? Data means information which is being recorded, processed, and stored in your information system. Data protection aims to protect personal and corporate data. Personal data means the rights of individuals and employees whom the data is about, mainly by placing duties on those who decide how and why such data is processed, and by this way, protect the image of the company. Corporate data concerns basically information relating to the company or its clients and suppliers, like contacts, clients' files, documents from the research department, contracts, etc. (source: Information Commissioner's Office, UK). Consumer data protection and privacy are intended to safeguard consumers' rights of privacy by limiting the types of information gathered and the ways in which such information is obtained, used and secured (source: EcoVadis).

Definition of the concepts

Introduction sentence to explain the types of actions than can be implemented

You will find below three types of actions: preventive/corrective actions (make sure that risks do not occur); correction (eliminate risks when they have occurred); monitoring (control that risks are managed).

1st filter: preventive actions, correction and monitoring

2nd filter: inform, manage, monitor

PREVENTIVE ACTIONS	CORRECTION	MONITORING
OBJECTIVE Train and educate your staff on data security, privacy and protection	**OBJECTIVE** Make sure that data is safe by ensuring that your IT systems and devices are secured	**OBJECTIVE** Control that data protection measures are implemented
WHY To prevent any data security breach	**WHY** To prevent cyber-attacks and data losses, data leakage, or disclosure of misleading	**WHY** To control that data security is ensured; to obtain ISO/CEI 27000 certification
WHO SA: everyone is concerned Actors: IT teams and trainers	**WHO** SA: companywide, especially risky populations Actors: IT teams	**WHO** SA: companywide, especially risky populations Actors: IT teams or internal/external auditors
HOW Organise e-learning courses or on-site training courses	**HOW** IT: control access rights, whistle blowing processes, install firewalls, install anti-virus programs, encrypt data, check USB safety	**HOW** Conduct one-off audits (external auditors) and permanent controls (internal controllers)

Actions are divided into four items:
- "Objective": what should be reached
- "Why": why this objective should be reached
- "Who: both scope of application (SA) and actors (A)
- "How": examples of concrete actions

For policies and actions, examples are given. What is satisfactory and missing is pointed out.

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SUSTAINABLE PROCUREMENT REPORTING — slide (Nokia)

What's specific for *Reporting* sheets?
(sheets in shades of yellow)

Reminder on how to formalize KPIs

Main criterion under review

List of potential KPIs to be followed

Reference of GRI 4 Guidelines

This guide is filled with links. Any word which is underlined is a link.

| Identify tailored recommendations with the following symbols:

Sector

- Manufacturing
- Network installation services
- Software

Size

- SMEs
- Large companies

Guide de mise en œuvre de la RSE

/

CSR Implementation User Guide

NOKIA

Cher Fournisseur,

Ce guide a pour objectif d'accompagner votre entreprise dans la mise en place d'actions RSE dans les domaines de l'environnement, des pratiques sociales, des pratiques éthiques et des achats durables.

Comment ce guide est-il structuré ?

Ce guide comporte :
- Cette introduction,
- Un focus sur les systèmes de management,
- Un focus sur les domaines de RSE,
- Le mode d'emploi pour parcourir les fiches d'amélioration,
- 21 fiches sur les points d'amélioration en matière de RSE : 6 sur l'environnement, 7 sur les pratiques sociales, 4 sur les pratiques éthiques, 4 sur les achats durables. Ces ressources sont en anglais.
- Un glossaire regroupant les termes de RSE les plus fréquents vous permet une navigation optimale,
- Des annexes sur la gouvernance, puis sur les plans d'amélioration chez Nokia.

Chaque fiche d'amélioration vise à :
- Vous permettre de comprendre les bénéfices de la mise en place de telles pratiques,
- Donner une définition précise et reconnue de chaque concept,
- Vous guider sur la manière de procéder (quels sont les sujets qui peuvent être traités et comment),
- Donner des exemples décodés en fonction de ce qui est satisfaisant et ce qui ne l'est pas,
- Adapter les recommandations en fonction de la taille, la localisation, et le secteur de l'entreprise, qui sont chacun représentés par des symboles.

Nous espérons que cette ressource sera utile pour vos équipes. Nous restons à votre disposition pour toute demande de clarification et serions heureux de recevoir vos éventuelles remarques.

Bien cordialement,

L'équipe des achats durables de Nokia

Sommaire

Focus sur les systèmes de management

Votre entreprise a été évaluée sur ses pratiques managériales en matière de RSE. Effectivement, le modèle de notation d'EcoVadis est basé sur les systèmes de management et consiste à analyser vos politiques, actions et résultats via un audit documentaire. L'évaluation est adaptée à votre profil : taille, location, secteur.

Définition : « La norme ISO 9000:2000 définit un système de management comme un 'ensemble d'éléments corrélés permettant d'établir une politique et des objectifs et d'atteindre ces objectifs'. Si l'on souhaite élargir cette définition, on pourrait l'interpréter plus clairement comme suit : un système de management professionnel correspond à ' la structure, les *process* et les ressources requises pour établir la politique d'une organisation et ses objectifs et pour atteindre ces objectifs' » (source : http://www.thecqi.org/Knowledge-Hub/Knowledge-portal/Corporate-strategy/Management-systems/).

La plupart des systèmes de management se basent sur les normes et outils de qualité, y compris la PDCA (planification, déploiement, contrôle, action) de Deming, dont l'objectif est l'amélioration continue des performances de l'entreprise.

Planification : premièrement, définir ce qui est significatif pour votre entreprise, principalement via l'évaluation d'impacts. Cela permettra de déterminer des objectifs, des engagements spécifiques et des méthodes visant à atteindre ces objectifs (ex. : politique), selon ce qui est significatif pour votre entreprise et ses parties prenantes.

Déploiement : mettre en place des actions visant à atteindre les objectifs de l'entreprise.

Contrôle : s'assurer de l'efficacité de ces actions via le suivi des indicateurs de performance clés / résultats.

Action : analyser ces indicateurs pour déterminer de nouveaux objectifs et de nouvelles actions pour les atteindre selon ce qui est efficace ou non.

Une fois que les indicateurs sont analysés pour vérifier l'efficacité des actions, vous planifiez à nouveau, mettez en place de nouvelles actions **qui amènent à suivre de nouveaux indicateurs, ce qui permet une amélioration continue**.

Le PDCA se retrouve dans la méthodologie d'EcoVadis. Pour chaque domaine (Environnement, Pratiques Sociales, Pratiques éthiques, Achats Durables), votre entreprise est évaluée sur ses politiques, actions et résultats.

Quels sont les éléments clés d'une bonne politique ?

➢ **Énoncés de mission**
- ▪ Le **contenu** potentiel de chaque politique est décrit dans chaque fiche d'amélioration et doit être adapté en fonction de la taille, de la localisation et du secteur.
- ▪ **Formalisation.** Une politique est un document visant à sensibiliser et informer les employés quant aux objectifs de l'entreprise. De fait, le logo de l'entreprise, la date et une signature du management sont requis. De plus, il est nécessaire d'expliciter les responsabilités dédiées, pour que les employés sachent à qui se référer en cas de question, et afin de s'assurer que ces politiques sont revues régulièrement. En outre, il est obligatoire de spécifier le champ d'application, ce qui montre aux employés qu'ils sont également concernés et que leur implication est un facteur clé dans la réalisation de vos objectifs.

➢ **Adhésion à un organisme externe.** Cela permet de bénéficier de conseils applicables à l'international ou spécifiques à chaque secteur, et d'accroître la visibilité parmi les parties prenantes. De telles initiatives peuvent inclure de nombreuses problématiques RSE (ex. : principes du Pacte mondial des Nations Unies), être spécifiques à certains sujets (ex. : Carbon Disclosure Project), intergouvernementales (ex. : Principes directeurs de l'OCDE à l'intention des entreprises multinationales), multi-parties prenantes (ex. : AccountAbility), axées sur l'activité, multi-sectorielles ou spécifiques à un secteur (ex. : EICC, CFSI).

Quels sont les éléments clés d'une bonne action ?

- ➢ **Mesures.** Les mesures doivent porter sur les critères RSE pertinents pour votre entreprise.
- ➢ **Champ d'application.** Les mesures sont réellement satisfaisantes à condition qu'elles couvrent les domaines et les parties prenantes adéquats. Le cas contraire, il est recommandé de spécifier au cas par cas, i.e. pour chaque action, qui est concerné par ces mesures.
- ➢ **Certifications.** Les certifications externes telles que l'OHSAS 18 000, l'ISO 14 001 donnent plus de crédibilité à votre entreprise.

Quels sont les éléments clés d'un bon reporting ?

- ➢ **Indicateurs clés de performance**. Champ d'application : les indicateurs clés de performance doivent couvrir tous les sujets de RSE pertinents pour votre entreprise en fonction de sa taille, sa localisation, et du secteur d'activité. Pertinence: ils devraient être structurés pour refléter la performance RSE de votre entreprise.
- ➢ **360°**. L'information des tiers sur la performance RSE votre entreprise. Seules les informations fiables sont prises en compte dans la notation.

Le système de management pour les PME (<50 employés)	Le système de management pour les grandes entreprises
Nous comprenons qu'il est plus facile pour les PME de s'adresser à tous les employés lors d'une réunion pour les informer des objectifs et engagements. Toutefois, nous conseillons aux PME d'élaborer un court document les résumant, qui peut être distribué ou affiché dans les bureaux. L'adhésion à un organisme externe est une bonne démarche mais nous comprenons que les PME ne souhaitent pas investir des ressources en ce sens.	Il est nécessaire de spécifier le champ d'application de votre politique et de s'assurer que tous les employés l'aient lue. L'approbation par un organisme externe est fortement recommandée.
Les actions représentent l'unique composante du système de management qui soit 100 % réalisables par les PME, donc nous espérons réellement que les PME les mettent en œuvre. Les certifications sont toujours appréciées mais nous comprenons que les PME ne souhaitent pas investir en ce sens.	Les actions doivent être mises en œuvre dans tous les domaines ayant un fort impact RSE et pour toutes les parties prenantes concernées, dès que possible. Accordez une attention particulière au champ d'application de vos mesures. Il est fortement requis de faire certifier votre système de management.
Les indicateurs clés de performance ne sont pas toujours pertinents lorsque les mesures ne concernent qu'une personne. Toutefois, les PME ont besoin de contrôler l'efficacité des actions, tout comme les entreprises de plus grande taille. Les rapports de développement durable sont toujours une bonne pratique, toutefois nous comprenons que les PME ne souhaitent pas investir des ressources en ce sens.	Les indicateurs clés de performance doivent être consolidés. Nous recommandons à votre entreprise d'essayer de les agréger autant que possible et d'élaborer un rapport public de développement durable qui suive les standards de reporting RSE tels que le Global Reporting Initiative (GRI).

Focus sur les domaines de RSE

Environnement

Parties prenantes principales : les consommateurs, les communautés locales (territoires et populations concernées) et les générations futures.

Les impacts environnementaux se produisent sur l'ensemble du cycle de vie du produit (bien ou service).

Votre entreprise peut avoir des impacts environnementaux liés :

À vos activités
- consommation énergétique et gaz à effet de serre
- matières, produits chimiques et déchets
- eau
- biodiversité
- pollution locale

À vos produits et services
- usage des produits
- cycle de vie des produits
- santé et sécurité des clients
- consommation durable

Toutes les entreprises ont des impacts environnementaux mais leur type et leur ampleur dépendent de l'entreprise : les entreprises de fabrication ont plus d'impacts, du fait de leurs activités.

Pratiques éthiques

Parties prenantes principales : parties prenantes liées aux activités de l'entreprise comme les fournisseurs, clients, concurrents. Les employés principalement concernés dans l'entreprise sont les vendeurs, acheteurs, managers.

Les pratiques éthiques correspondent à la nécessité pour les entreprises de respecter les lois locales et les normes internationales, de suivre le cadre concurrentiel et d'être transparentes.

Votre entreprise peut avoir des impacts éthiques liés à :
- la corruption
- les pratiques anticoncurrentielles
- la protection des données

Ces sujets nécessitent une attention particulière dans les pays à risque.

Pratiques sociales

Parties prenantes principales : toutes les personnes travaillant pour et dans l'entreprise.

Les pratiques sociales concernent les ressources humaines et les pratiques des droits de l'homme, et correspondent à la manière dont les entreprises gèrent leurs impacts envers les employés.

Les impacts sociaux sont liés à :

- la santé et la sécurité (priorité n°1)
- les conditions de travail
- la gestion de carrière
- le dialogue social
- le travail des enfants et le travail forcé
- la discrimination
- les droits humains fondamentaux

Toutes les entreprises ont ce type d'impacts. Ces sujets nécessitent une attention particulière dans les pays à risque.

Les achats durables

Parties prenantes principales : les fournisseurs et sous-traitants, tout tiers qui vend des produits (biens ou services) à l'entreprise.

Les achats durables concernent les impacts environnementaux sociaux et éthiques générés par les fournisseurs de l'entreprise. Il s'agit d'inclure des critères environnementaux, sociaux et éthiques dans la chaîne d'approvisionnement afin de gérer les risques RSE.

Il existe deux approches concernant les achats durables.

1) Une approche fournisseur : les entreprises ayant une chaîne d'approvisionnement peuvent demander à leurs fournisseurs de gérer leurs propres impacts environnementaux, sociaux et éthiques.
2) Une approche produit : les entreprises n'ayant pas de chaîne d'approvisionnement doivent se concentrer davantage sur les achats à usage interne ; toutes les entreprises sont donc concernées.

Mode d'emploi : comment parcourir les fiches d'amélioration ?

Logo de l'entreprise. Nokia est le propriétaire de ces fichiers

Que contiennent les fiches *Politique* ? *(violet)*

Nom du fichier : domaine de RSE ou critère + section du système de management (politiques, actions ou résultats) ainsi qu'un bouton pour retourner au sommaire

Cadre expliquant les bénéfices des politiques

Points d'amélioration EcoVadis principaux qui peuvent être traités avec les recommandations suivantes

Rappel sur ce qui doit être réalisé avant de rédiger la politique

Les critères et sous-critères EcoVadis inclus dans ce domaine

Définition du sous-critère d'après des sources internationales

Rappel sur la manière de formaliser une politique.

Qu'est ce qui est spécifique aux fiches *Actions* ? *(bleu)*

Focus sur les risques gérés et les opportunités professionnelles qui peuvent être atteintes grâce à la mise en œuvre de ces actions

Définition des concepts

Phrase d'introduction pour expliquer les types d'actions qui peuvent être mis en œuvre
1er filtre : actions préventives, correctives et de suivi
2nd filtre : information, gestion et suivi

Les actions sont divisées en quatre catégories :
- « Objectif »: ce qui doit être atteint
- « Pourquoi »: pourquoi cet objectif doit être atteint
- « Qui »: le périmètre d'application (SA) et les acteurs (A)
- « Comment »: liste d'actions potentielles

Des exemples sont donnés pour les politiques et les actions, où sont mis en avant les éléments satisfaisants et manquants.

Qu'est-ce qui est spécifique aux fiches *Reporting* ?
(jaune)

Rappel sur la formalisation des indicateurs clés de performance

Principaux critères concernés

Liste des potentiels indicateurs clés de performance à suivre

Référence aux lignes directrices GRI 4

Ce guide contient de nombreux liens qui sont facilement identifiables par leur forme soulignée.

| Identification des recommandations adaptées avec les symboles suivants :

Secteurs

 Fabrication

 Services d'installation des réseaux

 Informatique

Taille

 PME

 Grandes entreprises

Glossaire Anglais-Français

Ce glossaire reprend les termes de RSE les plus fréquemment utilisés dans ce guide. Il vous permettra de naviguer plus aisément parmi les fiches d'amélioration qui sont en anglais.

GENERAL	GÉNÉRAL	Absenteeism	Absentéisme
EHS (Environment Health and Safety)	Environnement, santé et sécurité	Working conditions	Conditions de travail
Operational risk	Risque opérationnel	Remuneration	Rémunération
Reputation risk	Risque réputationnel	Social benefits	Avantages sociaux
Legal risk	Risque légal	Working hours	Heures de travail
Materiality matrix	Matrice de matérialité	Profit-sharing plan	Plan de participation aux bénéfices
Management system	Système de management	Healthcare	Soins de santé
Policy	Politique	Work/Life balance	Conciliation vie privée/vie professionnelle
Action	Action	Employee handbook	Manuel de l'employé
Results	Résultats	Career Management	Gestion de carrière
KPIs (Key Performance Indicators)	Indicateurs clés de performance	Recruitment	Recrutement
Corporate Social Responsibility (CSR)	Responsabilité sociétale des entreprises (RSE)	Training	Formation
Sustainable development	Développement durable	Lay-off	Licenciement
Manufacture	Fabrication	Annual interview	Entretien annuel
Software	Conception de programmes informatiques	Social Dialogue	Dialogue social
Installation	Installation (de réseaux)	Employee representative	Représentant du personnel
LABOR PRACTICES	PRATIQUES SOCIALES	Collective bargaining	Négociation collective
Health and Safety	Santé et Sécurité	Trade Union	Syndicat
Occupational safety	Sécurité au travail	Collective agreement	Accord collectif
Industrial hygiene	Hygiène au travail	Human Rights	Droits de l'homme
Sanitation	Sanitaires	Harassment	Harcèlement
Emergency preparedness	Plan d'intervention en cas d'urgence	Discrimination	Discrimination
Machine safeguarding	Protection contre les machines	Forced labor	Travail forcé
Risk mapping	Cartographie des risques	Child labor	Travail des enfants
Prevention plan	Plan de prévention	Moral and physical violence	Violence psychologique et physique
Personal Protective Equipment	Équipements de protection personnelle	Security	Sécurité
Tower climbing	Travail en hauteur	Property rights	Droits de propriété
Accident frequency rate	Taux de fréquence des accidents	Civil rights	Droits Civils
Accident severity rate	Taux de gravité des accidents		

FAIR BUSINESS PRACTICES	PRATIQUES ÉTHIQUES
Corruption	Corruption
Bribery	Pot-de-vin
Conflict of interest	Conflit d'intérêts
Gifts & Entertainment	Cadeaux et avantages
Embezzlement	Détournement
Money-laundering	Blanchiment d'argent
Insider trading	Délit d'initié
Whistle-blowing system	Dispositif d'alerte éthique
Extortion	Extorsion
Fraud	Fraude
Anticompetitive Practices	Pratiques anticoncurrentielles
Bid-rigging	Manipulation des soumissions d'offres
Price fixing	Fixation des prix
Dumping	Dumping
Coercive monopoly	Monopole coercitif
Product tying	Ventes liées de produits
Intellectual property	Propriété intellectuelle
Data	Données
Data privacy	Confidentialité des données
Data security	Sécurité des données
Confidentiality	Confidentialité
Security Breach	Faille de sécurité
ENVIRONMENT	ENVIRONNEMENT
Life cycle	Cycle de vie
Ecodesign	Éco-conception
Impact assessment	Étude d'impact
Product Use/End of life	Utilisation/fin de vie du produit
Greenhouse Gases	Gaz à effet de serre
CO2 emissions	Émissions de CO2

Energy consumption	Consommation d'énergie
Energy reduction	Réduction d'énergie
Renewable energy	Énergie renouvelable
Gas	Gaz
Coal/charcoal	Charbon
Heater	(Système de) chauffage
Energy efficiency	Efficacité énergétique
Power consumption	Consommation d'électricité
Waste & Chemicals	Déchets et substances chimiques
Waste	Déchets
Waste Electrical and Electronic Equipment Directive (WEEE Directive)	Directive relative aux déchets d'équipements électriques et électroniques (DEEE)
Recycle	Recycler
Reuse	Réutiliser
Chemicals	Substances chimiques
Material Safety Data Sheet (MSDS)	Fiche de données de sécurité ou FDS
Hazardous substances	Substances dangereuses
Water	Eau
Water consumption	Consommation d'eau
Water pollution	Pollution des eaux
SUSTAINABLE PROCUREMENT	ACHATS DURABLES
Supply chain	Chaîne d'approvisionnement
Suppliers	Fournisseurs
Environmental requirements	Exigences environnementales
Social requirements	Exigences sociales
Audit	Audit
Assessment	Évaluation
Capacity building	Renforcement des capacités

Guía para la implementación de la RSE

/

CSR Implementation User Guide

Querido Proveedor,

La finalidad de esta guía es ayudar a su empresa a implementar acciones de RSE en las áreas siguientes: medioambiente, prácticas laborales, prácticas éticas y compras sostenibles, enfocándose en el sistema de gestión de la empresa.

¿Cómo funciona esta guía?

Esta guía contiene:
- Esta introducción,
- Un resumen con enlaces,
- Un foco sobre sistemas de gestión,
- Un foco sobre los campos de la RSE,
- Instrucciones: ¿Cómo utilizar las fichas técnicas?,
- 21 fichas técnicas de áreas de mejora en inglés: 6 para el medioambiente, 7 para las prácticas laborales, 4 para las prácticas éticas y 4 para las compras sostenibles.
- Una lista de términos RSE traducidos en español para que pueda navegar en las fichas en inglés.

¿Cuáles son los fines de cada una de las fichas técnicas?
- Ayudarle a entender los beneficios de tales prácticas,
- Darle una definición acertada y reconocida,
- Proveerle con consejos sobre la manera de proceder (qué debería proveer y cómo),
- Demostrarle con ejemplos explicativos lo que es satisfactorio o obligatorio,
- Establecer recomendaciones respetando el tamaño, la localización y el sector de la empresa con símbolos.

Esperamos que esta guía sea una herramienta útil para su departamento. Permanecemos a su disposición si necesita cualquier clarificación y le agradezcamos por los futuros comentarios que puedan hacer.

Atentos saludos,

El departamento de compras sostenibles de Nokia

Resumen con enlaces

- ➢ Un foco sobre los **sistemas de gestión**
- ➢ Un foco sobre **los campos de la RSE**
- ➢ Instrucciones**: ¿Cómo utilizar las fichas técnicas?**
- ➢ Glosario Inglés- Español

Fichas técnicas de áreas de mejora

Medioambiente
- Política medioambiental
- Acciones de gestión del consumo de energía y gases de efecto invernadero
- Acciones de gestión de los materiales, los químicos y los residuos
- Acciones de gestión del agua
- Acciones sobre el uso y el final de vida útil del producto
- Seguimiento medioambiental

Prácticas laborales
- Política de prácticas laborales
- Acciones de gestión de la salud y la seguridad
- Acciones de gestión de las condiciones laborales
- Acciones de gestión de carrera
- Acciones de gestión del diálogo social
- Acciones de gestión de los derechos humanos
- Seguimiento de prácticas laborales

Prácticas éticas
- Política de prácticas éticas
- Acciones de gestión de corrupción y prácticas anticompetitivas
- Acciones sobre la confidencialidad de los datos
- Seguimiento de prácticas éticas

Compras sostenibles
- Política de compras sostenibles
- Acciones de compras sostenibles
- Seguimiento de compras sostenibles
- Minerales conflictivos

Foco sobre los sistemas de gestión

Se evaluaron las prácticas de gestión de su empresa sobre la RSE. De hecho, el sistema de clasificación de EcoVadis se base en sistemas de gestión y procede a una auditoria documentaria para analizar sus políticas, acciones y resultados. La evaluación toma en cuenta el perfil de cada compañía: el tamaño, la localización y el sector.

Definición: "ISO 9000:2000 define un sistema de gestión como 'un conjunto de elementos interrelacionados o interaccionando para establecer política y objetivos, y para lograr esos objetivos'. Ampliando esta definición, la interpretación más clara quizás sea que un sistema de gestión de empresa es: 'La estructura, los procesos y los recursos necesarios para establecer la política y los objetivos de una organización y para lograr esos objetivos." (Fuente: http://www.thecqi.org/Knowledge-Hub/Knowledge-portal/Corporate-strategy/Management-systems/)

La mayoría de los sistemas de gestión se fundan en métodos de calidad que incluyen el círculo PDCA de Deming (del inglés *plan, do, check, act*) cuyo objetivo es una estrategia de mejora continua.

Planificar: empiece por definir lo que es material, principalmente por la evaluación de impactos. Eso le permite planificar objetivos, detallar compromisos y los métodos utilizados para lograr esos objetivos (p. ej. políticas), según lo que es material para la empresa y las partes interesadas.
Hacer: implementar acciones para lograr los objetivos empresariales.
Verificar: asegurarse de que las acciones sean eficientes gracias a los KPIs/resultados.
Actuar: analizar los KPIs para determinar nuevos objetivos y nuevas acciones para lograr los objetivos según lo que es eficiente.

Una vez que se analizaron los **KPIs** para verificar que las acciones sean eficientes, se debe **planificar** otra vez, implementar nuevas **acciones** que van a conducir a **nuevos KPIs**, lo que permite una **mejora** continua.

El círculo PDCA de Deming se reencuentra en la metodología de EcoVadis. Para cada campo (Medioambiente, Prácticas Laborales, Prácticas Éticas, Compras Sostenibles) se evalúa la empresa sobre Políticas, Acciones, y Resultados.

¿Por qué una política es buena?

➢ **Declaraciones de la misión**
- Se describe el **contenido** potencial en cada ficha técnica de áreas de mejora. El contenido debe ser adaptado al tamaño, a la localización y al sector de la empresa.
- **Formalización**. Una política es un documento cuyo objetivo es despertar conciencia entre los empleados y informarlos de los objetivos de la empresa. Así, el logo de la empresa, la fecha y la firma del *management* se encuentran en la política. Además, necesitamos un representante del tema para que los empleados sepan a quién dirigirse cuando tienen una pregunta, y para que esa persona verifique que se revisen regularmente las políticas. Además, el alcance de aplicación es obligatorio porque muestra a los empleados sus derechos y deberes y ven que su participación es fundamental para lograr los objetivos de la empresa.

➢ **Adhesión**. Permite beneficiar de direcciones internacionales o sectoriales, y mejorar la visibilidad entre las partes interesadas. Tales iniciativas pueden incluir muchos asuntos de la RSE (p. ej. los principios del Pacto Mundial), focalizarse en asuntos especificados (p. ej Carbon Disclosure Project), ser intergubernamentales (p. ej. las líneas directrices de la OCDE para empresas multinacionales), incluir varias partes interesadas (p. ej. AccountAbility), focalizarse en la actividad, intersectoriales o especificadas al sector (p. ej. EICC, CFSI).

¿Por qué una acción es buena?

- ➢ **Medidas.** Medidas deberían focalizarse en las áreas de impacto de la empresa
- ➢ **Alcance de aplicación.** Medidas pueden ser satisfactorias, pero necesitan cubrir las áreas importantes de la empresa y las partes interesadas. Si no cubre todas las partes interesadas o las áreas de impacto, especifique al alcance de aplicación de las mayores acciones.
- ➢ **Certificaciones.** Certificaciones extérnales como OHSAS 18 00, ISO 14 001 permiten a la empresa beneficiarse de una credibilidad más importante.

¿Por qué un seguimiento es bueno?

- ➢ **KPIs.** Cobertura: los KPIs tienen que cubrir las áreas de impacto de la RSE más importantes según el tamaño, la localización y el sector de la empresa. Relevancia: se deberían estructurarlos para que reflejen los rendimientos de la RSE de la empresa.
- ➢ **360°.** Información externa sobre el rendimiento de la RSE de la empresa. Se toman en cuenta en la clasificación sólo cuando la información sea verificada.

Sistema de gestión para las Pequeñas y medianas empresas o pymes (<50 empleados)

Entendemos que es más fácil para las Pymes hablar a todos los empleados para informarles de los objetivos durante una reunión. Sin embargo, aconsejamos a las Pymes que tengan un documento corto que los resume y que se puede fijar en la oficina. La adhesión a iniciativas externas es buena pero entenderíamos si la Pyme no invirtiera dinero en este recurso puesto que la rentabilidad de inversión no es importante.

Acciones representan los puntos de sistema de gestión que son relevantes a cien por ciento para las Pymes. Entonces, esperamos mucho que la Pymes los implementen. Se aprecian siempre las certificaciones pero entenderíamos si la Pyme no invirtiera dinero en este recurso como la rentabilidad de inversión no es importante.

Los KPIs no siempre son relevantes cuando las medidas conciernen una persona. Sin embargo, las Pymes tienen que monitorizar la eficacidad de las acciones como todas las empresas.

Los informes de desarrollo sostenible siempre son una buena práctica pero entenderíamos si la Pyme no invirtiera dinero en este recurso como la rentabilidad de inversión no es importante.

Sistema de gestión para las grandes empresas

Por favor, indique el alcance de aplicación de las políticas de su empresa y asegúrese que todos los empleados las lean. Se recomiende altamente la adhesión.

Se tienen que aplicar las acciones para todas las áreas de impacto y para todas las partes interesadas cada vez que es posible. Preste una atención particular a la cobertura de las medidas de su empresa. Las certificaciones de sistemas de gestión son muy convenientes.

Se deberían consolidar los KPIs. Recomendamos a su empresa intentar sumarlos tanto como se pueda y tener un informe de desarrollo sostenible público que sigue los seguimientos estándares de la RSE como la Iniciativa de Reporte Global (del inglés *Global Reporting Initiative* - GRI).

Foco sobre los campos de RSE

Medioambiente

Partes interesadas: clientes, comunidades locales (territorios y poblaciones integradas) generaciones futuras.
Los impactos medioambientales se observan durante todo el ciclo de vida del producto (bienes o servicios).

La empresa puede tener impactos medioambientales relacionados con:

La actividad:
- el consumo de energía y los gases de efecto invernadero
- el agua
- la biodiversidad
- la contaminación local
- los materiales, residuos y productos químicos

El producto y el servicio:
- el uso del producto
- el final de vida útil del producto
- la salud y la seguridad del cliente
- el consumo sostenible

Todas las empresas tienen impactos medioambientales pero su tipo e importancia dependen de la empresa: las manufacturas tienen más impactos debido a sus actividades.

Prácticas éticas

Partes interesadas: las partes relacionadas con el negocio como por ejemplo los proveedores, los clientes, los concurrentes. Los empleados claves afectados son los vendedores, los compradores y los directores.
Las prácticas éticas se refieren a la ética. Se espera de las empresas que cumplan con los requisitos de todas las normas locales y los estándares internacionales, que respeten la competencia de las infraestructuras y que sean transparentes.

La empresa puede tener impactos éticos relacionados con: - la corrupción y el soborno
- las prácticas anticompetitivas
- la confidencialidad de los datos

Preste una atención particular si la empresa está en un país con riesgos.

Prácticas laborales

Partes interesadas: todas las personas que trabajan para y en la empresa.

Las prácticas laborales corresponden a los recursos humanos y los derechos humanos, se enfoque en la manera en que las empresas gestionan sus impactos hacia los empleados.

Se relacionan los impactos sociales con:

- la salud y la seguridad (prioridad número 1)
- las condiciones laborales
- la gestión de carrera
- el diálogo social
- el trabajo infantil y forzoso
- la discriminación
- les derechos humanos fundamentales

Todas las empresas están sujetas a estos impactos. Preste una atención particular a estos temas si la empresa está en un país con riesgos.

Compras sostenibles

Partes interesadas: los proveedores y los subcontratistas, todas las terceras partes que venden productos (bienes o servicios) a la empresa.

Las compras sostenibles se refieren a los impactos medioambientales y laborales de los proveedores de la empresa o de los productos comprados por la empresa. El objetivo es incluir criterios medioambientales, sociales y éticos en la cadena de suministro para gestionar los riesgos RSE de los proveedores.

Existen dos enfoques dentro de las compras sostenibles:

1) Proveedor: Las empresas que tienen una cadena de suministro deberían pedir a sus proveedores gestionar sus propios impactos medioambientales, sociales y éticos.

2) Producto: Las empresas que no tienen una cadena de suministro deberían enfocarse en los productos para incluir criterios medioambientales y sociales en los productos. Eso significa que todas las empresas son afectadas.

INSTRUCTIONES: ¿Cómo utilizar las fichas técnicas de áreas de mejora?

El logo de Nokia, el propietario de las fichas

¿Qué es incluido en las fichas de *Política*? *(violeta)*

El nombre de la ficha: el campo o criterio que trata de la RSE más la categoría del sistema de gestión (política, acción, seguimiento) y hay un vinculo que permite regresar al resumen

Formula que explica los beneficios de las políticas

Las áreas de mejora principales de EcoVadis que se pueden abordar con las recomendaciones siguientes

Un recordatorio sobre lo que es necesario hacer antes escribir una política

Los mayores criterios y sub-criterios que EcoVadis incluye en este campo

La definición de los sub-criterios con fuentes internacionales

Un recordatorio que explica como formalizar una política

¿Qué es especifico a las fichas de *Acción*? *(azul)*

Foco en la gestión de los riesgos y de las oportunidades de negocio que se pueden desarrollar al implementar estas acciones

Definición de los conceptos

Une frase de introducción para explicar los tipos de acciones que se puede implementar
1ero filtro: acciones preventivas, de corrección y seguimiento
2ndo filtro: informar, gestionar, seguir

Las acciones son divididas en cuatro artículos:
Objetive: lo que deben alcanzar
Why: por qué se debe alcanzar ese objetivo
Who: alcance de aplicación y actores
How: ejemplos de acciones potenciales

Para las políticas y las acciones, se dan los ejemplos. Se señala lo que es satisfactorio y lo que falta.

SUSTAINABLE PROCUREMENT REPORTING

¿Qué es específico a las fichas de *Seguimiento*?
(amarillo)

Un recordatorio sobre la manera de formalizar un KPI

Los criterios principales revisados

Una lista de los KPIs potenciales

Una referencia a la guía GRI 4 (Iniciativa de Reporte Global)

Hay vínculos en la guía que son subrayados para navegar en las fichas técnicas.

| Identifiquen las recomendaciones específicas con los símbolos siguientes:

Sectores

Manufactura

Servicios de instalación de red

Software

Tamaño

Pymes

Grandes empresas

Glosario inglés-español

GENERAL	*GENERAL*	Absenteeism	Absentismo Ausentismo
EHS (Environment Health and Safety)	*Medioambiente, salud y seguridad*	Working conditions	*Condiciones de trabajo*
Operational risk	*Riesgo operativo*	Remuneration	*Remuneración*
Reputation risk	*Riesgo reputacional*	Social benefits	*Ventajas sociales*
Legal risk	*Riesgo legal*	Working hours	*Horas de trabajo*
Materiality matrix	*Matriz de materialidad*	Profit-sharing plan	*Plan de participación en los beneficios*
Management system	*Sistema de gestión*	Healthcare	*Asistencia sanitaria*
Policy	*Política*	Work/Life balance	*Conciliación entre la vida privada y la vida profesional*
Action	*Acción*	Employee handbook	*Manual del empleado*
Results	*Resultados*	Career Management	*Gestión de carrera*
KPIs (Key Performance Indicators)	*Indicadores claves de rendimiento /desempeño*	Recruitment	*Contratación*
Corporate Social Responsibility (CSR)	*Responsabilidad social empresarial (RSE) o corporativa (RSC)*	Lay-off	*Despido*
Sustainable development	*Desarrollo sostenible*	Training	*Formación*
Manufacture	*Fabricación*	Annual interview	*Entrevista anual*
Software	*Software*	Social Dialogue	*Diálogo social*
Installation	*Instalación de red*	Employee representative	*Representante de los trabajadores*
LABOR PRACTICES	*PRÁTICAS SOCIALES*	Collective bargaining	*Negociación colectiva*
Health and Safety	*Salud y seguridad*	Trade Union	*Sindicato*
Occupational safety	*Seguridad laboral*	Collective agreement	*Convenio colectivo*
Industrial hygiene	*Higiene laboral*	Human Rights	*Derechos humanos*
Sanitation	*Instalaciones sanitarias*	Harassment	*Hostigamiento*
Emergency preparedness	*Plan de contingencias*	Discrimination	*Discriminación*
Machine safeguarding	*Protección contra los riesgos provocados por las máquinas*	Forced labor	*Trabajo forzoso*
Risk mapping	*Cartografía de los riesgos*	Child labor	*Trabajo infantil*
Prevention plan	*Plan de prevención*	Moral and physical violence	*Violencia psicológica y moral*
Personal Protective Equipment	*Equipo de protección personal*	Security	*Seguridad*
Tower climbing	*Trabajo en altura*	Property rights	*Derecho de propiedad*
Accident frequency rate	*Índice/tasa de frecuencia de accidentes*	Civil rights	*Derechos civiles*
Accident severity rate	*Índice/Tasa de gravedad de accidentes*		

FAIR BUSINESS PRACTICES	PRÁTICAS ÉTICAS	Energy consumption	Consumo de energía
Corruption	Corrupción	Energy reduction	Reducción de energía
Bribery	Soborno	Renewable energy	Energía renovable
Conflict of interest	Conflicto de intereses	Gas	Gas
Gifts & Entertainment	Obsequios y beneficios	Coal/charcoal	Carbón
Embezzlement	Malversación	Heater	Calefactor
Money-laundering	Blanqueo de dinero	Energy efficiency	Eficiencia energética
Insider trading	Información privilegiada	Power consumption	Consumo de energía
Whistle-blowing system	Dispositivo de vigilancia ética	Waste & Chemicals	Residuos y productos químicos
Extortion	Extorsión	Waste	Residuos
Fraud	Fraude	Waste Electrical and Electronic Equipment Directive (WEEE Directive)	Directiva sobre residuos de aparatos eléctricos y electrónicos (DWEE)
Anticompetitive Practices	Prácticas anticompetitivas	Recycle	Reciclar
Bid-rigging	Manipulación fraudulenta de licitación	Reuse	Reutilizar
Price fixing	Fijación de precios	Chemicals	Sustancias químicas
Dumping	Dumping	Material Safety Data Sheet (MSDS)	Hoja de datos de seguridad (HDS)
Coercive monopoly	Monopolio coercivo	Hazardous substances	Sustancias peligrosas
Product tying	Productos atados/ Modelo de cebo y anzuelo	Water	Agua
Intellectual property	Propiedad intelectual	Water consumption	Consumo de agua
Data	Datos	Water pollution	Contaminación del agua
Data privacy	Confidencialidad de los datos	SUSTAINABLE PROCUREMENT	COMPRAS SOSTENIBLES
Data security	Seguridad de los datos	Supply chain	Cadena de suministro
Confidentiality	Confidencialidad	Suppliers	Proveedores
Security Breach	Deficiencia de seguridad	Environmental requirements	Requisitos medioambientales
ENVIRONMENT	MEDIOAMBIENTE	Social requirements	Requisitos sociales
Life cycle	Ciclo de vida	Audit	Auditoría
Ecodesign	Diseño ecológico	Assessment	Evaluación
Impact assessment	Evaluación de impacto	Capacity building	Refuerzo de las capacidades
Product Use/End of life	Uso y final de vida útil del producto		
Greenhouse Gases	Gases de efecto invernadero (GEI)		
CO2 emissions	Emisiones de CO2		

《企业社会责任实施指南》

NOKIA

亲爱的供应商：

本《企业社会责任实施指南》（下称"指南"）旨在通过对管理体系的关注来帮助您的企业更好地实践环境保护、劳工及人权、商业道德和可持续采购这几方面的企业社会责任。

本《指南》包括以下几个部分：
- 此前言
- 建立企业管理体系
- 企业社会责任的各个领域介绍
- 如何使用此《指南》
- ２１张改进计划指引表，其中６张为环境保护领域指引表、７张为劳工及人权领域指引表、４张为商业道德领域指引表和４张为可持续采购领域指引表。

每张"改进计划指引表"旨在：
- 帮助您了解实施企业社会责任带来的好处
- 向您提供企业社会责任各领域准确的和符合国际标准的定义
- 指导您如何实施（该制定什么措施及怎样实施）
- 通过例子为您讲解什么是符合标准的行为及什么不是
- 根据您的机构的规模、所在地点以及行业提供不同的建议

我们希望本《指南》可以为您的团队提供有用的资源。若您有需要，我们十分乐意为您提供进一步的解释，并且欢迎您给于任何反馈和建议。

非常感谢！

诺基亚可持续采购团队

目录

建立企业管理体系

EcoVadis 已经对您的企业社会责任管理体系进行了评估。EcoVadis 根据您公司的规模、所在地、以及所属的行业来调整评估的项目和标准，然后基于您公司的管理体系，通过书面审核相关政策、措施和结果来进行评分。

ISO 9000:2000 把管理体系定义为"以相互关联或相互作用的一组要素来建立方针和目标并实现这些目标的体系。"从此定义衍生，也许对管理体系最清楚的解释应该为：建立政策和目标，并实现这些目标所需要设立的框架、操作流程和资源配置。（来源：http://www.thecqi.org/Knowledge-Hub/Knowledge-portal/Corporate-strategy/Management-systems/）

大部分机构的管理体系源自于质量管理的方法，如戴明博士提出的运用于持续改善产品质量的 PDCA 循环概念。

Plan 计划：首先明确什么是影响评估中的重要因素。这可以帮助您的公司根据企业和利益相关方所关心的重点来制定目标、执行细节以及实施方案（例如制定政策）。

Do 执行：采取行动以达到企业制定的目标。

Check 检查：确保实施的行动能有效地为"关键业绩指标"或期待的结果服务。

Act 处理：通过分析"关键业绩指标"总结哪些是有效的措施，并相应制定新目标和举措。
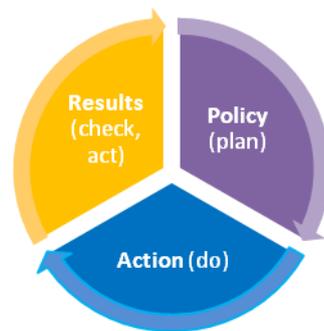
一旦分析了行动对"关键业绩指标"是否有效，就要开始设立新的"关键业绩指标"以及相应执行措施，不断自我完善的管理体系。

EcoVadis 的评估方法体现了 PDCA 循环概念，对环境保护、劳工及人权、商业道德和可持续采购进行从政策制定发布、实施行动到绩效跟踪的全方位评估。

如何制定符合标准的政策?

- ➤ **职责陈述**
  - ▪ **政策内容**已在"改进计划指引表"中详细说明，并根据企业的规模、所在地点以及行业相应调整。
  - ▪ **格式标准化**：政策是一份用以提高员工的意识和告知他们企业目标的文件。因此企业的标志、文件发行的日期和管理层的签字都是必需的。不仅如此，每项工作都应该指定专门的负责人，这样员工才知道出现问题时应向哪个有关部门报告。企业还应定期审查和更新政策。此外，政策中必需列明适用范围，让员工明白这份政策对其的相关性，以及他们的行为对公司是否能实现目标起到至关重要的作用。
- ➤ **加入外部的企业社会责任组织/行动**不仅可以让您的机构获得来自国际的或行业的指导，而且可以增加在利益相关群体中的知名度。这些组织/行动涵盖了众多企业社会责任方面的议题（如：全球契约原则），还包括特定领域方面的（如：供应链碳披露）、政府间方面的（如：OECD 跨国企业准则）、多利益方方面的（如：AccountAbility）、商业事务方面的、跨行业方面的或特定行业方面的（电子行业公民联盟、CFSI）。

什么是有效的行动措施？

- ➢ 规划的行动**措施**需要适用于与您企业相对应的企业社会责任标准。
- ➢ **执行范围**必须覆盖您机构涉及的影响范围和利益相关方。详细说明每项措施的执行范围。
- ➢ 通过获取第三方**合格证书**，如 OHSAS 18 000 及 ISO 14 001 以增加您企业的公信力。

如何编制符合标准的报告?

- ➢ 覆盖度：根据企业的规模、所在地点以及行业的情况制定能够涵盖所有重要企业社会责任议题的**关键业绩指标**。相关性：整合后的这些信息必须能反映出企业履行社会责任的成绩。
- ➢ **360°**：纳入第三方机构对您企业社会责任方面的披露或评估信息。只有不存在争议的信息才被纳入评分项目。

中小型企业管理体系（＜５０员工）

我们明白对于中小型企业来说，通过召开会议把制定的目标和承诺传达给所有员工是最容易的方法，但是，我们仍然建议中小型企业把这些信息整合起来，制定成一份文件贴在办公室内。虽然我们提倡您加入外部的企业社会责任组织/行动，但我们可以理解中小企业考虑到投资回报率的问题而不在此方面投入大量资源。

对于中小企业而言，展开完全符合企业现况的行动是最有效的，因此我们要求中小企业以采取行动为首要措施。虽然我们提倡您申请外界认证，但是我们也理解中小企业考虑到投资回报率的问题而不在此方面投入大量资源。

在措施执行范围仅覆盖一名员工的情况下，设立关键业绩指标往往不太适用。即使如此，中小型企业也必需监控执行效率。发布可持续发展报告是一个好方法，但是我们也理解中小企业考虑到投资回报率的问题而不在此方面投入大量资源。

大型企业管理体系

请说明政策的执行范围并保证员工都阅读了这些政策。我们大力提倡企业加入外界的企业社会责任组织/行动。

企业须要尽可能为所有会受到影响的利益相关方制定各领域的相关措施，并关注措施的覆盖范围。申请管理体系认证也是非常可取的作法。

大型企业必须设立统一的关键业绩指标。我们建议您把全部绩效指标集中化，并按照企业社会责任报告标准编制一个对外界公开的可持续发展报告。（可参考《全球报告倡议组织》）

企业社会责任/可持续发展的各个领域

环境

　　主要利益相关方：消费者、地方社区（受企业影响的地区和人口）、后代。

　　整个产品生命周期对环境产生的影响（产品或服务）。

　　您的企业对环境产生的影响可能来源于：

生产活动：
- 能源消耗量以及温室气体排放
- 水资源
- 物种多样性
- 本地污染
- 原材料、化学品和废弃物

产品和服务：
- 产品使用
- 产品生命末期
- 消费者健康及安全
- 可持续消费

　　每家企业都会对环境产生影响，但是影响的类型和程度取决于每家机构的特征。制造类企业由于生产作业往往会对环境影响产生较大的影响。

道德标准

　　主要利益相关方：业务相关方，如：供应商、消费者、竞争对手。企业主要相关员工：营销人员、采购人员、管理人员。

　　正当商业行为是与商业道德相关的。企业应当遵守所有当地法规、国际标准、遵守竞争架构、公开透明。

　　您的机构可能产生的道德影响涉及到：
- 反腐败或反贪污行为
- 反不正当竞争行为
- 信息保密

　　若您的企业位于被视为高风险的国家，请务必加倍留意此类影响。

劳工及人权

　　主要利益相关方：包括所有在企业内工作及为企业工作的人员。

　　劳工及人权关系到人力资源，涉及如何管理企业对员工产生的影响。

　　社会影响包括：

- 员工健康及安全（头等重要）
- 工作环境
- 员工职业发展
- 社会对话
- 童工及强制劳工
- 歧视
- 基本人权

　　此类影响关系到每家企业。若您的企业位于被视为高风险的国家，请务必加倍留意以上影响。

可持续采购

　　主要利益相关方：供应商和分包商，以及任何向企业供应产品（实物或服务）的第三方组织。

　　可持续采购涉及到供应商产生的环境及劳工影响。可持续采购旨在将对供应商的环境、社会和商业道德风险的监控纳入企业社会责任的风险管理中。

　　可持续采购包括两种管理方法：

　　１．有供应链的企业须要求供应商管理其环境、社会和商业道德影响。

　　２．无供应链的企业须注重内部物资采购。由于任何企业皆有内部物资采购，因此这种方法适用于到所有企业。

如何使用"改进计划指引表"？

紫色部分为您介绍了政策方面的内容。

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NOKIA
FAIR BUSINESS PRACTICES POLICY
Back to contents

ecoVadis | Improvement areas ⚠
- Claims a policy on responsible marketing/business ethics but no supporting documentation
- No business ethics policies
- Basic ethics policy

WHY A POLICY?
Set clear rules for employees
Provide an ethic framework

Reminder: Before drafting the policy, your company should identify the most relevant issues at stake according to its profile. Best practice: set quantitative targets.

What you can address in your Ethics/Fair Business Practices

Corruption & Bribery
All forms of corruption at work:
- ✓ Extortion: demanding a sum of money (or goods) with a threat of harm (physical or business) if demands are not met (source: UK's Serious Fraud Office or SFO).
- ✓ Bribery: giving or receiving something of value to influence a transaction (source: Serious Fraud Office, UK).
- ✓ Conflict of interest: where an employee has an economic or personal interest in a transaction (source: SFO).
- ✓ Gifts and entertainment: gifts and entertainment are defined to mean anything of monetary value, offered or received by clients, potential clients or any other business partners (source: US Office of Government Ethics).
- ✓ Fraud: abuse of position, or false representation, or prejudicing someone's rights for personal gain (source: SFO).
- ✓ Money laundering: a financial transaction scheme that aims to conceal the identity, source, and destination of illicitly-obtained money (source: Financial Action Task Force or FATF).

Anti-competitive practices
- ✓ Bid-rigging: a scheme in which businesses collude so that a competing business can secure a contract for goods or services at a pre-determined price (source: Australian Competition and Consumer Commission or ACCC).
- ✓ Price fixing, Limit pricing, Predatory pricing: an agreement among competitors that sets, lowers, or stabilizes prices or competitive terms (source: US Federal Trade Commission or FTC).
- ✓ Dumping: the export by a country or company of a product at a price that is lower in the foreign market than the price charged in the domestic market (source: FTC).
- ✓ Coercive monopoly: setting the prices and production policies independent of the market, with immunity from competition (source: Organisation for Economic Cooperation and Development or OECD, Investopedia).
- ✓ Product tying: illegal arrangement where, in order to buy one product, the consumer must purchase another product that exists in a separate market (source: FTC).
- ✓ Dividing territories: agreements between competitors to split markets and not compete with each other (source: money-zine.com).

Data privacy
- ✓ Consumer and data protection, privacy, truthfulness of marketing messages
- ✓ Intellectual property: refers to creations of the mind, such as inventions; literary and artistic works; designs; and symbols, names and images used in commerce (source: World Intellectual Property Organization).

Don't forget!
- ☐ Dedicated responsibilities
- ☐ Logo of the company
- ☐ Scope of application
- ☐ Signature of the management
- ☐ Policy issue date

79

文件名称：指出所属的企业社会责任领域（环境保护、劳工及人权、商业道德或可持续采购），以及属于管理体系中的哪个环节（政策、措施或结果）。每页都有回到目录的捷径按钮。

此处介绍制定政策带来的好处

EcoVadis 提出的主要改进方面

在此处提示您在撰写政策之前需要完成的工作。

EcoVadis 的评估项目和标准

标准的定义及参考文件

此处提示您如何标准化政策的格式

蓝色部分为您介绍了措施方面的内容。

您可以通过这些措施来管理商业风险

项目的定义

此处介绍了可采取的几种措施：
第一层：防范措施、校正措施和监督措施。
第二层：通告、管理和监督。

每项措施分成四个步骤：
"目标"：该制定什么目标
"原因"：为什么制定此目标
"范围"：涉及到谁，以及谁来负责实施？
"方法"：通过实际例子讲解如何采取措施

政策类指引和措施类指引分别提供例子来帮助您理解什么是值得参考的，又不足在什么地方。

NOKIA
DATA PRIVACY ACTIONS
Back to contents

ecoVadis | Improvement areas ⚠
- No supporting documentation on implemented measures regarding data privacy
- No information on implementation measures regarding data privacy

RISKS MANAGED / OPPORTUNITIES
Reputation impacts
Avoid legal claims while strengthening clients' trust

🖥 These actions are specifically important for Software firms.

What is data privacy?
What is data? Data means information which is being recorded, processed, and stored in your information system. Data protection aims to protect personal and corporate data. Personal data means the rights of individuals and employees whom the data is about, mainly by placing duties on those who decide how and why such data is processed, and by this way, protect the image of the company. Corporate data concerns basically information relating to the company or its clients and suppliers, like contacts, clients' files, documents from the research department, contracts, etc. (source: Information Commissioner's Office, UK). Consumer data protection and privacy are intended to safeguard consumers' rights of privacy by limiting the types of information gathered and the ways in which such information is obtained, used and secured (source: EcoVadis).

You will find below three types of actions: preventive/corrective actions (make sure that risks do not occur); correction (eliminate risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTIONS	CORRECTION	MONITORING
OBJECTIVE Train and educate your staff on data security, privacy and protection	**OBJECTIVE** Make sure that data is safe by ensuring that your IT systems and devices are secured	**OBJECTIVE** Control that data protection measures are implemented
WHY To prevent any data security breach	**WHY** To prevent cyber-attacks and data losses, data leakage, or disclosure of misleading	**WHY** To control that data security is ensured; to obtain ISO/CEI 27000 certification
WHO SA: everyone is concerned Actors: IT teams and trainers	**WHO** SA: companywide, especially risky populations Actors: IT teams	**WHO** SA: companywide, especially risky populations Actors: IT teams or internal/external auditors
HOW Organise e-learning courses or on-site training courses	**HOW** IT: control access rights, whistle blowing processes, install firewalls, install anti-virus programs, encrypt data, check USB safety	**HOW** Conduct one-off audits (external auditors) and permanent controls (internal controllers)

黄色部分为您介绍了报告方面的内容。

此处提示您如何标准化关键业绩指标的格式

报告的评判标准

可以设定哪些关键业绩指标

可参考《全球报告倡议组织４.０》标准

此指南划线处可点击参考链接。

| 以下符号表示不同方面的建议：

行业

 制造生产类

 网络安装调试服务

 软件类

规模

 中小型企业

 大型企业

英汉词汇表

GENERAL	综合项目	Absenteeism	缺勤比例
EHS (Environment Health and Safety)	环境保护、健康和安全措施	Working conditions	工作条件
Operational risk	操作风险/运营风险	Remuneration	薪酬
Reputation risk	声誉风险	Social benefits	社会保障
Legal risk	法律法规风险	Working hours	工作小时数
Materiality matrix	重要性矩阵	Profit-sharing plan	分红政策
Management system	管理体系	Healthcare	医疗保障
Policy	政策	Work/Life balance	工作、生活平衡
Action	措施和行动	Employee handbook	员工手册
Results	结果	Career Management	员工职业发展
KPIs (Key Performance Indicators)	关键绩效指标	Recruitment	员工招聘政策
Corporate Social Responsibility (CSR)	企业社会责任	Lay-off	解雇
Sustainable development	可持续发展	Training	员工培训
Manufacture	制造生产类	Annual interview	年终回顾
Software	软件类	Social Dialogue	社会对话
Installation	安装类	Employee representative	员工代表
LABOR PRACTICES	劳工及人权	Collective bargaining	集体谈判
Health and Safety	员工健康及安全	Trade Union	员工公会
Occupational safety	职业安全	Collective agreement	集体协议
Industrial hygiene	工业卫生	Human Rights	人权
Sanitation	公共卫生	Harassment	骚扰
Emergency preparedness	应急准备	Discrimination	歧视
Machine safeguarding	机器防护	Forced labor	强迫、强制劳动
Risk mapping	风险评估和管理图	Child labor	童工
Prevention plan	安全预防	Moral and physical violence	精神威胁和暴力行为
Personal Protective Equipment	个人防护装备	Security	安全保护
Tower climbing	高空作业	Property rights	知识产权
Accident frequency rate	工伤率	Civil rights	公民权
Accident severity rate	事故严重率		

FAIR BUSINESS PRACTICES	商业道德	**Energy consumption**	能源消耗量
Corruption	贪污腐败行为	**Energy reduction**	能源降低
Bribery	行贿	**Renewable energy**	可再生能源
Conflict of interest	利益冲突	**Gas**	气体
Gifts & Entertainment	礼品和其他好处	**Coal/charcoal**	煤/碳
Embezzlement	盗用公款	**Heater**	加热器
Money-laundering	洗钱行为	**Energy efficiency**	能效
Insider trading	内幕交易	**Power consumption**	电力消耗
Whistle-blowing system	举报机制	**Waste & Chemicals**	废弃物和化学品
Extortion	串谋行为	**Waste**	废弃物、垃圾物
Fraud	欺诈行为	**Waste Electrical and Electronic Equipment Directive (WEEE Directive)**	废电机电子设备指令
Anticompetitive Practices	反不正当竞争行为	**Recycle**	循环
Bid-rigging	串通投标行为	**Reuse**	再利用
Price fixing	价格操纵行为	**Chemicals**	化学品
Dumping	倾销行为	**Material Safety Data Sheet (MSDS)**	材料安全数据表
Coercive monopoly	强迫性垄断	**Hazardous substances**	有害物质
Product tying	搭售行为	**Water**	水资源管理
Intellectual property	知识产权	**Water consumption**	用水量
Data	信息	**Water pollution**	水污染
Data privacy	信息保密	**SUSTAINABLE PROCUREMENT**	可持续采购
Data security	信息安全	**Supply chain**	供应链
Confidentiality	保密性	**Suppliers**	供应商
Security Breach	安全漏洞	**Environmental requirements**	环境需求
ENVIRONMENT	环境保护	**Social requirements**	社会需求
Life cycle	生命周期	**Audit**	审计
Ecodesign	生态设计	**Assessment**	评估
Impact assessment	影响评估	**Capacity building**	能力培养
Product Use/End of life	产品生命末期		
Greenhouse Gases	温室气体排放		
CO2 emissions	二氧化碳排放		

IMPROVEMENT AREA DATASHEETS

Contents (all languages)

Environment
- Environmental Policy
- Energy Consumption and GHG Actions
- Materials, Chemicals and Waste Actions
- Water Actions
- Product-Related Actions
- Environmental Reporting

Environnement
- Politique environnementale
- Actions sur la consommation énergétique et les gaz à effet de serre
- Actions sur les matières, les produits chimiques et les déchets
- Actions sur la gestion de l'eau
- Actions sur le cycle de vie des produits
- Reporting environnemental

Medioambiente
- Política medioambiental
- Acciones de gestión del consumo de energía y gases de efecto invernadero
- Acciones de gestión de los materiales, los químicos y los residuos
- Acciones de gestión del agua
- Acciones sobre el uso y el final de vida útil del producto
- Seguimiento medioambiental

环境
- 环境保护政策
- 能源消耗以及温室气体排放管理
- 原材料、化学品和废弃物管理
- 用水管理
- 产品改进
- 环境报告

Labor practices
- Labor Practices Policy
- Health and Safety Actions
- Working Conditions Actions
- Career Management Actions
- Social Dialogue Actions
- Human Rights Actions
- Labor Practices Reporting

Pratiques sociales
- Politique sur les pratiques sociales
- Actions de santé et de sécurité
- Actions sur les conditions de travail
- Actions sur la gestion de carrière
- Actions sur le dialogue social
- Actions sur les droits de l'homme
- Reporting sur les pratiques sociales

Prácticas laborales
- Política de prácticas laborales
- Acciones de gestión de la salud y la seguridad
- Acciones de gestión de las condiciones laborales
- Acciones de gestión de carrera
- Acciones de gestión del diálogo social
- Acciones de gestión de los derechos humanos
- Seguimiento de prácticas laborales

劳工及人权
- 劳工政策
- 员工健康及安全管理
- 工作环境改善
- 员工职业发展措施
- 社会对话
- 人权保护措施
- 劳工报告

Fair Business Practices
- Fair Business Practices Policy
- Anticompetitive and Corruption Actions
- Data privacy Actions
- Fair Business Practices Reporting

Pratiques éthiques
- Politique éthique
- Actions contre la corruption et les pratiques anticoncurrentielles
- Actions sur la confidentialité des données
- Reporting sur les pratiques éthiques

Prácticas éticas
- Política de prácticas éticas
- Acciones de gestión de corrupción y prácticas anticompetitivas
- Acciones sobre la confidencialidad de los datos
- Seguimiento de prácticas éticas

正当商业行为
- 商业道德政策
- 反不正当竞争和反贪污腐败措施
- 信息保密措施
- 商业道德报告

Sustainable procurement
- Sustainable Procurement Policy
- Sustainable Procurement Actions
- Sustainable Procurement Reporting
- Conflicts Minerals

Achats durables
- Politique d'achats durables
- Actions en matière d'achats durables
- Reporting sur les achats durables
- Minerais de conflit

Compras sostenibles
- Política de compras sostenibles
- Acciones de compras sostenibles
- Seguimiento de compras sostenibles
- Minerales conflictivos

可持续采购
- 可持续采购政策
- 可持续采购措施
- 可持续采购报告
- 冲突矿物质

ecoVadis | Improvement areas ⚠
SUSTAINABLE SUPPLY MANAGEMENT

- *Basic environmental policy*
- *Claims policies on environmental issues, but no supporting documentation*

WHY A POLICY?

Set clear rules for employees

Provide an environment-friendly framework

Reminder: Before drafting the policy, your company should identify the most relevant issues at stake according to its profile. Best practice: set quantitative goals.

What you can address in your Environment Policy:

These are the main impacts we have identified for Nokia's suppliers, but some companies may deal with other environmental issues e.g. local pollution, biodiversity, sustainable consumption or customers' health and safety.

Energy Consumption & GHG

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

The production of electronic components and boards is a highly energy-intensive activity. A substantial amount of energy is used in the form electricity consumption. For example, manufacturing one kilogram of electronics or nanomaterials requires between 280 KWh and 28 MWh of electricity; enough to power a flat screen television continuously for 41 days to 114 years *(source: EcoVadis)*.

Water

Water consumption during operations. Pollutants rejected into water. The high intensity use of water in the manufacturing process has enormous impacts on the environment; groundwater pollution being one of the main risks. For example, the production of an eight inch wafer produces 3,787 gallons of waste water. Irresponsible wastewater management at production sites is another source of potential environmental contamination *(source: EcoVadis)*.

Manufacturing companies are specifically concerned by GHG emissions and energy consumption, as well as water consumption and management.

Materials, waste and chemicals

Consumption of all types of raw materials and chemicals. Non-hazardous and hazardous waste generated from operations. Also includes air emissions other than GHG (e.g. SOx, NOx). During the manufacturing process of electronic components and boards, a significant amount of waste is generated. The electronics industry uses high volumes of material resources, many of those materials comprising of hazardous chemicals. Waste treatment problems are often related to mismanagement of hazardous waste *(source: EcoVadis)*.

Product Use

Environmental impacts generated from the direct use of products. These impacts can include energy, water, materials and chemicals use *(source: EcoVadis)*.

Product End-of-Life

Direct Environmental impacts generated from the end-of-life of the products. These impacts can include hazardous, non-hazardous waste generated, emissions and accidental pollution. The recycling and disposal of e-waste (obsolete electrical and electronics components/boards) poses significant problems, largely since many of the products contain numerous hazardous chemicals and materials which can pose threats to the environment as well as to human health. *(Source: EcoVadis)*.

Don't forget!

☐ **Dedicated responsibilities** ☐ **Scope of application** ☐ **Policy issue date**

☐ **Logo of the company** ☐ **Signature of the management**

EXAMPLE OF AN ENVIRONMENTAL POLICY

The environmental policy below was chosen as it addresses relevant subjects for the company, while it misses some formalization items. Moreover it does not define all major elements. Note that all core issues above-mentioned must be addressed in your company's policy when relevant to its profile and activities.

Satisfactory: it contains the logo

Purcell Systems, Inc.

Missing: dedicated responsibilities

Purcell Systems Quality Policy

Purcell Systems will consistently provide products and services that meet or exceed the requirements of our customers. Our commitment to quality is reflected in the following objectives:

Fanatical customer service, continuous improvement of all processes and services, and overall product quality will be the responsibility of each employee.

Satisfactory: it contains the scope of application

To ensure our business management system meets the standards required to compete in a global economy, we will maintain registration to the international standards ISO 9001-2008, ISO 14001:2004, and TL 9000.

Missing: there is no clear definition of criteria mentioned and no quantitative targets

Environmental Management System (EMS) Policy

PURCELL SYSTEMS is committed to being a positive and creative force in the protection and enhancement of the local and global environment. This is evident through the minimization of hazardous materials and our continuous efforts to reduce our consumption of natural resources throughout the company. The fundamental principal of PURCELL SYSTEMS' environmental policy is to minimize any negative impact to the environment while conserving natural resources. Using education and administrative controls, we continuously assess our processes and practices to identify areas for reduction in energy, waste and emissions.

PURCELL SYSTEMS will take all reasonable measures to meet the following targets: Minimization of generated waste through reduction, reuse and recycling

- Efficient use of energy through management controls and routine practices
- Efficient use and conservation of water through management control and routine practices
- Minimize, substitute, and where possible, eliminate the use of hazardous chemicals in processes and operations

Satisfactory: it addresses criteria relevant to this company relating to energy, water, hazardous chemicals, product cycle of life

It is consistent with PURCELL SYSTEMS' environmental policy to comply with all applicable federal, state and local laws and regulations. PURCELL SYSTEMS is committed to meeting or exceeding environmental law, standards and regulations.

ecoVadis SUSTAINABLE SUPPLY MANAGEMENT | **Improvement areas** ⚠

- *No information on implementation measures regarding energy consumption and Green House Gas (GHG)*
- *No information on energy consumption*
- *No information on electricity consumption*
- *No monitoring of direct CO2 emissions*

RISKS MANAGED	OPPORTUNITIES
Avoid energy losses	Reduce energy use
Consumptions and pollutions are limited and managed	Reduce energy cost and save money

All organizations are concerned, as all of them use energy and release GHG. Only the quantity of energy consumed varies according to the size of your company.
According to your sector, the main source of GHG emission differs:

Factories, machines   Cars   Data centers

What are energy consumption and GHG emissions?

Where does Greenhouse Gas Emission come from? A greenhouse gas is a gas in the atmosphere that absorbs the radiation of the infrared range. Five "natural" greenhouse gases (water vapour, carbon dioxide, methane, nitrous oxide and ozone) exist in the Earth's atmosphere. But since the Industrial Revolution, the concentration of carbon dioxide (CO_2) has increased, and affects the temperature of the Earth (Greenhouse effect). Carbon dioxide emission is produced by human activities, mostly due to the excessive consumption of energy. Reducing energy consumption leads to GHG emissions reduction *(sources: Climate Communication, Carbon Trust)*.

Energy consumption (e.g. electricity, fuel, renewable energies) is used during operations and transport. Greenhouse gases direct and indirect emissions include CO_2, CH_4, N_2O, HFC, PFC and SF_6; Also include production of renewable energy by the company *(source : EcoVadis).*

You will find below three types of actions: preventive actions (make sure that risks do not occur); correction actions (eliminate risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTIONS

OBJECTIVE
Implement plans to reduce company's energy needs and GHG emissions

WHY
Prevent and eliminate further energy waste, limit GHG emissions, improve energy efficiency

CORRECTION ACTIONS

OBJECTIVE
Reduce the amount of the company's energy consumption and GHG emissions

MONITORING

OBJECTIVE
Have the company's carbon footprint under control

WHY
Check that preventive and correction actions are efficient and enable energy reduction and thus money saving

ENERGY CONSUMPTION AND GHG ACTIONS

PREVENTIVE ACTIONS

WHO
SA: everyone, from workers operating on machines to office employees, including internal workplaces as well as external interventions
Actors: trainers and management

HOW
1) Raise employees' awareness about energy consumption reduction 2) Implement energy reduction rules (heating, use of cars, air-conditioning) 3) Train them on energy saving methods

CORRECTION ACTIONS

WHO
SA: activities with the most environmental impacts
Actors: management and local teams

HOW
Adopt new equipment, technology or production processes that require less energy for the same level of performance (ex: substitution of machines by those that consume renewable energy and pollute less GHG)

MONITORING

WHO
SA: activities with environmental impacts
Actors: management, internal or external independent auditors

HOW
1) Target the sources of GHG emissions and analyse its impacts in term of carbon footprint 2) Track energy reduction to see if the preventive and correction actions are efficient

ENERGY CONSUMPTION AND GHG ACTIONS

EXAMPLE OF PREVENTIVE ACTION:

ENERGY SAVING INSTRUCTIONS

We chose this example to help you engage with saving energy in the workplace and because it is the easiest action that a company can carry out, and particularly it does not require high investment (unlike correction actions that require substantial investment to upgrade equipment and systems).

It is necessary that the company explains the considerable impacts of energy reduction for the environment, and its benefits for the company as well. Because very often, most employees wonder what difference they could really make, so it is the management's role to tell them how they can actually make a big difference, to the company and to the Earth.

We recommend that you email the document to employees, read it at staff meeting and trainings, add it to your intranet, and post it in high visibility areas like break rooms, elevators, or even meeting rooms.

Satisfactory: Start up by considering different sources of energy consumption, and edit tips according to employees' different roles.

Energy-saving instructions

For office employees:

1. Print only when necessary. Print back-to-back. This will not only reduce paper wastage but also helps to cut energy required to run printer.

2. Unplug electronics such as cell phones and laptops once they're charged. Adapters plugged into outlets use energy even if they're not charging.

3. Make sure that you switch off all electronic devices: printers, scanners, microwave, lights, air conditioners, coffee vending machines during weekends or holidays.

4. Use artificial lights in areas which are dark, and make sure that you switch off them while leaving.

5. Reduce heating and cooling consumption. Use air conditioning only when above 24°C. Reduce the temperature on the thermostat down to the minimum comfortable level (lowering set points by just 1°C).

   Etc.

For factory employees:

1. Tune up heating equipment.

2. Inspect ducts and windows, seal any leaks.

3. Calibrate thermostats and set them at appropriate temperatures.

4. Inspect, clean and change fuel piping and filters.

5. Use renewable energy sources whenever possible.

   Etc.

MATERIALS, CHEMICALS AND WASTE ACTIONS

ecovadis SUSTAINABLE SUPPLY MANAGEMENT | Improvement areas ⚠️

- *No information on implementation measures regarding material, chemicals and waste*

These actions concern especially manufacturing companies.

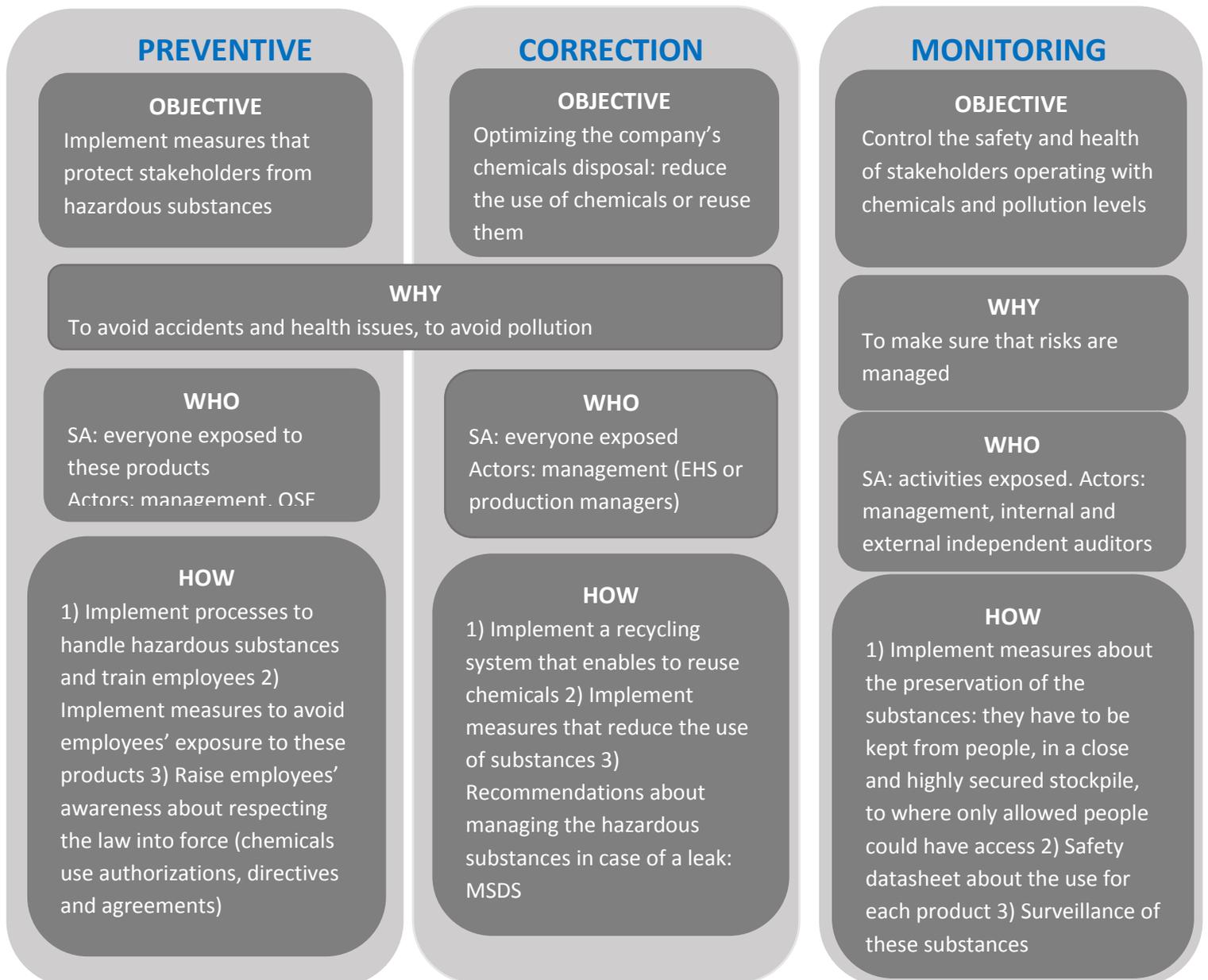| RISKS MANAGED	OPPORTUNITIES
Stakeholders health or safety issues	Save materials and resources
Chemicals and other waste impacts are limited and managed	Reuse recycled waste

What are materials, chemicals and waste?

Consumption of all types of raw materials and chemicals and generation of waste. Also include air emissions other than GHG (e.g. SOx, NOx). During the manufacturing process of electronic components and boards, a significant amount of waste is generated. The electronics industry uses high volumes of material resources, many of those materials comprising of hazardous chemicals. (*Source: EcoVadis*).

A chemical is considered hazardous if it is either listed on one of the international lists of hazardous substances such as REACH or RoHS. If the company does not respect properly these restrictions, it could pose risks to the environment and employees' safety and health issues and legal claims.

You will find below three types of actions for *CHEMICALS AND MATERIALS*: *preventive actions (make sure that risks do not occur); correction actions (eliminate risks when they have occurred); monitoring (control that risks are managed).*

PREVENTIVE

OBJECTIVE
Implement measures that protect stakeholders from hazardous substances

WHY
To avoid accidents and health issues, to avoid pollution

WHO
SA: everyone exposed to these products
Actors: management, QSE

HOW
1) Implement processes to handle hazardous substances and train employees 2) Implement measures to avoid employees' exposure to these products 3) Raise employees' awareness about respecting the law into force (chemicals use authorizations, directives and agreements)

CORRECTION

OBJECTIVE
Optimizing the company's chemicals disposal: reduce the use of chemicals or reuse them

WHO
SA: everyone exposed
Actors: management (EHS or production managers)

HOW
1) Implement a recycling system that enables to reuse chemicals 2) Implement measures that reduce the use of substances 3) Recommendations about managing the hazardous substances in case of a leak: MSDS

MONITORING

OBJECTIVE
Control the safety and health of stakeholders operating with chemicals and pollution levels

WHY
To make sure that risks are managed

WHO
SA: activities exposed. Actors: management, internal and external independent auditors

HOW
1) Implement measures about the preservation of the substances: they have to be kept from people, in a close and highly secured stockpile, to where only allowed people could have access 2) Safety datasheet about the use for each product 3) Surveillance of these substances

MATERIALS, CHEMICALS AND WASTE ACTIONS

You will find below three types of actions related to WASTE: preventive actions (make sure that risks do not occur); correction actions (eliminate risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTION

OBJECTIVE
Implement measures and procedures that reduce waste

WHY
To reduce waste that can be avoided

WHO
SA: everyone
Actors: EHS managers

HOW
1) Raise employees' awareness about the impacts of waste on environment 2) Define procedures about preventing and sorting out waste 3) Train employees about waste management

CORRECTION

OBJECTIVE
Optimizing the company's waste disposal processes

WHY
To manage waste that could not be avoided

WHO
SA: everyone
Actors: EHS managers

HOW
1) Implement measures that optimize the recycling methods (for example: Waste treatment plant) 2) Reuse waste in production

MONITORING

OBJECTIVE
Control the levels of waste generation

WHY
To make sure that the measures implemented lead to waste reduction and optimization of waste

WHO
SA: activities generating waste. Actors: management (EHS managers) but also internal or external independent auditors

HOW
1) Follow KPIs on waste 2) Make internal or external audits on the company's waste streams

NOKIA
MATERIALS, CHEMICALS AND WASTE ACTIONS

EXAMPLE OF MATERIAL RECYCLING AND WASTE DISPOSAL

The example is a document that covers mainly the ownership, treatment and disposal of materials and waste, so as to ensure that materials are properly recycled, and that hazardous waste are safely managed.

You can start by defining a list of materials and waste that you are going to manage.

Contents

Recyclable Materials
    Office Recyclables
    Confidential Papers
    Glass
    Toner Cartridges
    Batteries
    Food Residues

Non-Recyclable Wastes

Sanitary Waste and Nappies

Waste Electronic and Electrical Equipment (WEEE)
    Hazardous WEEE
    Non-Hazardous WEEE

Fluorescent Tubes

Bulky Items (Including Furniture)

Reusable Items

Misc Items
    Pallets
    Bread Baskets

Then detail a specific waste management process, for example: hazardous WEEE (below).

Satisfactory: Definition and characterization of waste in accordance with national codes and regulations

Satisfactory: Different parties are involved during the process, each of them as well as their dedicated responsibilities have to be mentioned.

Satisfactory: Details about recycling information: chemical name, sort out location

Waste Electronic and Electrical Equipment (WEEE)
Hazardous WEEE

1. Hazardous WEEE are items of electronic and electrical waste which are defined as being hazardous under the List of Wastes (England) Regulations 2005 and typically include fridges (which may contain CFCs or similar) and computer monitors (which may contain components including lead or similarly treated glass). On occasion, digital confidential wastes may be handled in accordance with this protocol.

2. Service users contact the Customer Service Centre (by raising a Service Request at https://www.ucl.ac.uk/maintenance-service-requests/) or by emailing efdservices@ucl.ac.uk to arrange for fridges, computers and computer monitors to be collected. Members of the O&G Service Team will collect the items and transfer them to the Physics Yard where they are segregated and stored.

3. Once sufficient quantity of hazardous WEEE has been accumulated, the O&G Site Waste Manager contacts ICEX, the waste sub-contractor, who arranges to collect the hazardous WEEE and transfer it back to their treatment facility.

4. Upon each collection the O&G Site Waste Manager and a representative from ICEX complete a hazardous waste consignment note which is given to the O&G Site Waste Manager. The consignment notes are filed in the Facilities Services Office, B05, 1-19 Torrington Place, where they are kept for three years.

5. WEEE is manually sorted at ICEX's site in Witham. Items are reused whenever possible but some items are automatically sent for recycling (refrigeration units and CRT monitors)

6. Depending on the type of equipment, our waste downstream is as follows:
   All Refrigerators – Energy Ready - Essex CO7 7RU
   All faulty TFT Monitors – SWEEEP Kuusakoski Kent ME10 2QB and TES-AM Ayrshire KA11 5AN
   All CRT monitors - SWEEEP Kuusakoski Kent ME10 2QB and TES-AM Ayrshire KA11 5AN
   All faulty Laptop batteries - TES-AM Ayrshire KA11 5AN
   Mixed plastics - SWEEEP Kuusakoski Kent ME10 2QB
   Metals and cable D & P Metals Essex CM8 3YU

MATERIALS, CHEMICALS AND WASTE ACTIONS

EXAMPLE OF A MATERIAL SAFETY DATA SHEET

A Material Safety Data Sheet (MSDS) is a document that contains information on potential hazards of the product (health, fire, reactivity and environmental), and how to work safely with the chemical material. It also contains information on use, storage, handling and emergency procedures related to the hazards of the material.

MSDSs are prepared by the supplier or manufacturer of the material. Every material that is listed as hazardous must have an accompanying MSDS that is specific to it. Below is a template of a MSDS, please complete all the required information. The format varies according to your product, from one country to another.

The template of a MSDS has been chosen as an example because it is a great way to respect employees' safety and health, but also to prevent environmental damages. According to EcoVadis methodology it is valued under LAB but is still considered relevant in general and here as it prevents chemicals leakage.

Section 1: Product & company identification
Product Name:
Product Number:
Product Use:
Manufacturer/Supplier Contact Information:

Section 2: Hazards identification
Emergency Overview; Dangers include:
Potential Health Effects: (acute effects, inhalation, ingestion, target organs, chronic effects…)

Section 3: Composition and information on ingredients
General information:
Component
Concentration
CAS number
% by Wt.

Section 4: First aid measures
(Eye contact, skin contact, inhalation, ingestion, note to physicians…)

Section 5: Fire-fighting measures
Flammable properties:
- Flash point:
- Upper explosive limit:
- Autoignition temperature:
- Lower explosive limit:
Fire and explosion data:
- Suitable extinguishing media:
- Products of combustion:
- Explosion hazards:
- Protection of fire-fighters:

Section 6: Accidental release measures
Personal precautions:
Environmental precautions:
Methods for containment & clean-up

Section 7: Handling & storage
Precautions for safe handling procedures:
Conditions for safe storage procedures:
Incompatibilities, specific end use:

Skin Protection

MATERIALS, CHEMICALS AND WASTE ACTIONS

Section 8: Exposure controls/Personal protection
    Exposure guidelines:
        -    Chemical name
        -    Type
    Exposure controls and protections:
        -    Engineering controls:
        -    Respiratory protection:
        -    Eye/face protection:

Section 9: Physical and chemical properties
    Physical state:
    Colour:
    Odour:
    Odour threshold:
    Specific gravity:
    Initial boiling point:
    Freezing point:
    Vapour pressure:
    Vapour density:
    Evaporating rate:
    Solubility:
    Coefficient of water/oil distribution:
    pH:
    Volatile organic compounds:

Section10: Stability and reactivity
    Stability:
    Condition to avoid:
    Incompatible materials:
    Hazardous decomposition products:
    Possibility of hazardous reactions

Section 11: Toxicological information
    Acute toxicity:
    Chronic toxicity:
    Germ cell mutagenicity:
    Carcinogenicity:
    Specific target organ toxicity:

Section 12: Ecological Information
    Ecotoxicty
    Persistence/degradability
    Bioaccumulation/accumulation
    Mobility in environment

Section 13: Disposal considerations
    Waste classification: (characteristic, waste code, regulations...)
    Disposal methods:

Section 14: Transport information
    Ground transportation:
    Air transportation:
    Water transportation:
    Special provisions:

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WATER ACTIONS

ecovadis SUSTAINABLE SUPPLY MANAGEMENT | Improvement areas ⚠

- *No information on implementation measures regarding water consumption & pollution management*
- *Claims measures regarding water consumption & pollution management but no supporting documentation*

RISKS MANAGED	OPPORTUNITIES
Avoid water losses	Improve water quality
Consumption and pollution are limited and managed	Reduce water use and cost

These actions concern mainly manufacturing companies but water management can be addressed by all companies (toilets, water consumption) although it is less critical.

What are water consumption and water pollution?

It concerns water consumption during operations as well as pollutants rejected into water.
What are the electronic sectorial issues? The high intensity use of water in the manufacturing process has enormous impacts on the environment; groundwater pollution being one of the main risks. For example, the production of an eight-inch water produces 3,787 gallons of wastewater. Irresponsible wastewater management at production sites is another source of potential environmental contamination. Discharged wastewater, even when pre-treated, often contains chemicals or heavy metals. While treatment processes may be able to degrade certain chemicals, they are not effective at dealing with Persistent Organic Pollutants (POPs) and heavy metals. Wastewater treatment facilities often fail to reduce Volatile Organic Compounds (VOCs), which are an important by-product of IC production *(Source: EcoVadis).*

You will find below three types of actions for WATER CONSUMPTION *preventive actions (make sure that risks do not occur); correction actions (eliminate risks when they have occurred); monitoring (control that risks are managed).*

PREVENTIVE ACTIONS

OBJECTIVE
Implement prevention plans that reduce company's water consumption

WHY
To save water ; to prevent and eliminate further water wastage

WHO
SA: everyone
Actors: EHS or production managers

HOW
1) Implement water conservation measures 2) Inform employees about these conservation processes and help them adopt water-saving behaviours

CORRECTION ACTIONS

OBJECTIVE
Manage water consumption that could not be avoided

HOW
1) Adopt new equipment, technology or production processes that require less water for the same level of performance 2) Install technologies that recycle wasted water 3) Examine the possibility of reusing water consumed

MONITORING

OBJECTIVE
Control that water levels and check that processes are efficient

WHY
To make sure that processes are implemented; to be able to implement corrective actions

WHO
SA: related activities
Actors: management, internal or external auditors

HOW
1) Track water consumption to monitor the improvements obtained thanks to the implementation of preventive actions (dashboard of water meter) 2) Set new water consumption thresholds and water-saving objectives

NOKIA

WATER ACTIONS

You will find below three types of actions for WATER POLLUTION: preventive actions (make sure that risks do not occur); correction actions (eliminate risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTIONS

OBJECTIVE
Implement prevention plans that reduce and sort water wastage and reduce pollution

WHY
To prevent and reduce further water wastage and its impacts on environment

WHO
SA: Everyone exposed to these risks; Actors: EHS or production managers

HOW
1) Raise employees' awareness about the impacts of water pollution on environment

2) Train them to measure water pollutants (BOD) or chemical oxygen demand (COD) or to learn processes that pollute less

CORRECTION ACTIONS

OBJECTIVE
Optimize the company's wastewater treatment

WHO
SA: Everyone exposed to these risks; Actors: EHS or production managers

HOW
1) Optimize wastewater treatment: use more purification and recovering machines 2) Adopt new equipment, technology or production processes that pollute less water discharges for the same level of performance: modern bio membrane reactors in an effort to reclaim and purify water. Solvent-free, water-based inks, adhesives and varnishes.

MONITORING

OBJECTIVE
Control levels of water pollution

WHY
To make sure that the measures implemented lead to water pollution reduction

WHO
SA: related activities. Actors: Management, internal or external auditors

HOW
1) Track the amount of water pollution

2) Make on-site internal or external audits related to these topics

WATER ACTIONS

EXAMPLE OF CORRECTION ACTIONS

RECYCLED WATER TREATMENT PROCESSES

Recycled water treatment is a series of processes that utilizes mechanical, physical, biological and chemical principles to remove pollutants from water. We chose it as an example, because it is not only a solution for a more environmentally friendly consumption – water wastage is recycled; but most importantly, it is also a solution for reducing water pollution – pollutants are greatly eliminated at the end of the whole process and it enables wasted water to be reused for various manufacturing purposes.

Source: http://www.edwardsaquifer.net/treatme.html

Satisfactory: Different treatment levels are indicated and explained

Recycled water treatment processes

Untreated wastewater
Wastewater going to treatment plants is more than 99% water. It comes from bathrooms, kitchens, laundries and businesses.

Primary treatment
This step removes large solid particles from wastewater using screening, grit removal and sedimentation.

Secondary treatment
Smaller particles and dissolved pollutants remain after primary treatment. 'Good' bacteria feed on and clean up organic particles and nutrients. Other typical treatment processes may include aeration, settling, clarification and chemical treatment.

Tertiary treatment
Deep sand beds are used to filter out nearly all remaining organic particles and suspended material.

Advanced treatment
This step may include microfiltration, ultrafiltration and reverse osmosis. These filters are so fine they can trap particles smaller than a millionth of a metre.

Disinfection
This is the last step for all types of recycled water.
The water is disinfected by chlorination and/or ultra violet light, depending on the end use.

pH

The recycled water is now ready for its intended use.

Secondary treatment
This type of recycled water can be used for timed irrigation.

Tertiary treatment
This type of highly treated recycled water is suitable for many uses including irrigation, in industry and for watering gardens and flushing toilets.

Advanced treatment
This type of highly treated recycled water is for specialised uses such as some manufacturing processes and for river flows.

For more information on water treatment processes:
http://www.waterworld.com/industrial-water.html

Satisfactory: Different intended purposes of outputs are indicated

PRODUCT-RELATED ACTIONS

ecovadis SUSTAINABLE SUPPLY MANAGEMENT **| Improvement areas** ⚠

- *Claims products with eco-label not applicable*
- *No information on implementation measures regarding mitigation of environmental impacts from product-use*
- *Declares measures on product end of life issues (e.g. WEEE or RoHS compliance), but no public information available*
- *No implementation measures in place regarding product end of life*

RISKS MANAGED	OPPORTUNITIES
Avoid endangering human health and harming the environment	Save costs through recycling
Non-compliance with regulation	Reduce the company's ecological impact

What are products and their environmental impacts?

A product is the item offered for sale. A product can be a service or an item. It can be physical or in virtual form. Every product is made at a cost and each is sold at a price. The price that can be charged depends on the market, the quality, the marketing and the segment that is targeted. Each product has a life after which it needs replacement and a life cycle after which it has to be re-invented (*source: The Economic Times*).

The environmental impacts of products occur after they are sold: at use and during their end-of-life.
- Environmental impacts generated from the direct use of products *(source: EcoVadis)*
- Environmental impacts from end-of-life. A product end of life (EOL), in the context of manufacturing and product lifecycles, is the final stages of a product's existence (*source: The Economic Times*). The environmental impacts of product end-of-life can include hazardous, non-hazardous waste generated, emissions and accidental pollution *(source: EcoVadis)*.

You will find below three types of actions: prevent (make sure that risks do not occur); manage (implement measures to avoid risks); monitor (control that risks are managed).

PREVENT

OBJECTIVE
Design product with lower environmental impacts

WHY
To avoid use of hazardous substances and reduce the energy consumption at use

WHO
Actors: R&D department
SA: implemented at production lines

HOW
Respect the local, national or international legislation (RoHS, REACH)
Restrict the use of hazardous substances from the start

MANAGE
1) Product use 2) Product end-of-life

OBJECTIVE
1) Inform customers on electricity consumption and health and safety hazards
2) Minimize environmental impacts during end-of-life

WHY
1) To manage customers' health and safety
2) To be more eco-friendly

WHO
Actors: EHS, product manager, sales. SA: products

HOW
1) Give information when selling or on the user technical sheets 2) Set a process of end-of-life waste management: dispose, recycle, reuse products (e.g. take back programs)

MONITOR

OBJECTIVE
Internal or external control
Monitor dedicated KPIs

WHY
Manage the performance for ecodesign and end-of life management, to improve the performance if necessary

WHO
Actors: EHS or product managers, Internal or external auditors
SA: dedicated products

HOW
Monitor KPIs
Internal controls or audits
Customer controls

EXAMPLE OF PRODUCT ENVIRONMENTAL INFORMATION SHEET

The following environmental sheet includes environmental information. Once the product is sold to clients, they know exactly the following environmental information:
- the product environmental certifications and qualifications
- the environmental-sensitive substances contained in the product
- the material used to produce this product
- the product energy consumption and efficiency
- if the product can be recycled or reused

This example does not ask specific and numbered data.
You can add if necessary and according to the environmental impacts of your company the following information:
- product upgradeability and repairability
- packaging
- consumable use

The product environmental information sheet has been chosen as an example because it is an important action that allows anyone to know environmental impacts and performances of the product during its conception, use and end-of-life.

Product Information

Product Type: (e.g., printer, copier, cellular phone, tablet etc.): _____

Product Name: _____

Model Number/SKU: _____

Environmental Certifications and Qualifications

Is this product sold with any eco-labels designations? 　　If yes, please specify:	Yes No

Environmentally-Sensitive Substances

Does this product contain any of the hazardous substances banned by the European Union Directive on the restriction of the use of certain hazardous substances (RoHS) in electrical and electronic equipment (2002/95/EC), including lead, mercury, cadmium, hexavalent chromium, and polybrominated biphenyl (PBB) and polybrominated diphenol ether (PBDE) flame retardants? 　　If yes, please specify:	Yes No
Does this product contain any of the substances included in the European Union Regulation (EC) No. 1907/2006, Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Candidate List of Substances of Very High Concern (SVHC) and Annex XIV (List of Substances Subject to Authorization)? 　　If yes, please specify:	Yes No
Does this product contain decabromodiphenyl ether (deca-BDE) flame retardants?	Yes No
Does this product contain brominated flame retardants (BFRs), chlorinated flame retardants (CFRs), and/or polyvinyl chloride (PVC)? 　　If yes, please specify:	Yes No

Satisfactory: the product environmental information sheet informs the customers about the product environmental impacts, performance and components

Material Selection

Does this product contain post-consumer recycled plastic content? 　　If yes, please specify percentage:	Yes No
Does this product contain biobased material? 　　If yes, please specify percentage:	Yes No

PRODUCT-RELATED ACTIONS

Energy Efficiency

Is this product ENERGY STAR® qualified?	Yes No N/A
Does this product meet the FEMP requirements for both energy efficiency AND low standby power?	Yes No N/A
Are ENERGY STAR power management features active upon delivery of this product?	Yes No N/A
Is documentation provided with this product that describes power management system, energy savings benefits and explains how to enable, disable and change settings?	Yes No N/A

Consumable Use

Does this product have duplex (i.e., double-sided) printing capabilities?	Yes No N/A
Are duplexing features active upon delivery of this product?	Yes No N/A
Can this product utilize paper made with 100% postconsumer recycled content?	Yes No N/A
Can this product utilize remanufactured or refilled toner or ink cartridges?	Yes No N/A
Is the product warranty voided by use of remanufactured or refilled toner or ink cartridges?	Yes No N/A

Missing: the exact energy consumption of the product at use

Design for End of Life

Does the product utilize glue, adhesives, or proprietary or specialized fasteners which require special tools to remove?	Yes No
Can the casing and main components of the product be removed with commonly available tools, or through snap-in/snap-out assembly?	Yes No
Does the documentation for this product include instructional information on the location, proper removal, and disposal of materials (including batteries) with special handing needs?	Yes No
Are major plastic components of this product labeled according to the International Organization of Standardization (ISO) Standard 11469:2000?	Yes No N/A
Do the major plastic components of this product contain adhesives, coatings, paints, finishes, or pigments incompatible with recycling?	Yes No N/A

Environmental Innovation

Are there any other innovative features of this product that improve its environmental performance? If yes, please describe:	Yes No

Corporate Environmental Information

Does your company have a Corporate Environmental Policy consistent with ISO 14001?	Yes No
Does your company have a corporate Environmental Management System?	Yes No
Is corporate environmental and/or sustainability information available on a website? If yes, please provide website:	Yes No

Take Back and Recycling Services

Are instructions provided for the recycling of this product?	Yes No
Are product take-back services available for this product?	Yes No
Is yes, does this product take-back service utilize third party certified electronics recyclers (i.e., R2 or e-Stewards certified)?	Yes No
Are toner and/or ink cartridge take back services available?	Yes No N/A
Are rechargeable battery take back services available?	Yes No N/A
Is information on take back and/or recycling services available on a website? If yes, please provide website:	Yes No

(Source: federal electronics challenge)

ecovadis
SUSTAINABLE SUPPLY MANAGEMENT

| Improvement areas ⚠

- *No information on electricity consumption*
- *No information on energy consumption*
- *No monitoring of total energy consumed*
- *Basic environmental reporting*
- *No environmental reporting*
- *No information on direct CO2 emissions*
- *No information on total energy consumed per ton of finished product*
- *No information on VOC emissions*

WHY monitor KPIs?

Monitor the company's performance and goal achievement

Foster continuous improvement

Don't forget!

- ✓ **Recent data up to 2 years old**
- ✓ **Format: graphs and tables with sources**
- ✓ **Scope of application taken into account**
- ✓ **Only report on implemented actions**

KPIs you can monitor in your Environmental Reporting:

According to your company activities, size or location, some criteria might be more relevant than others.

GHG emissions: what can you report?

To monitor GHG emissions

- CO2 emissions per year in tons
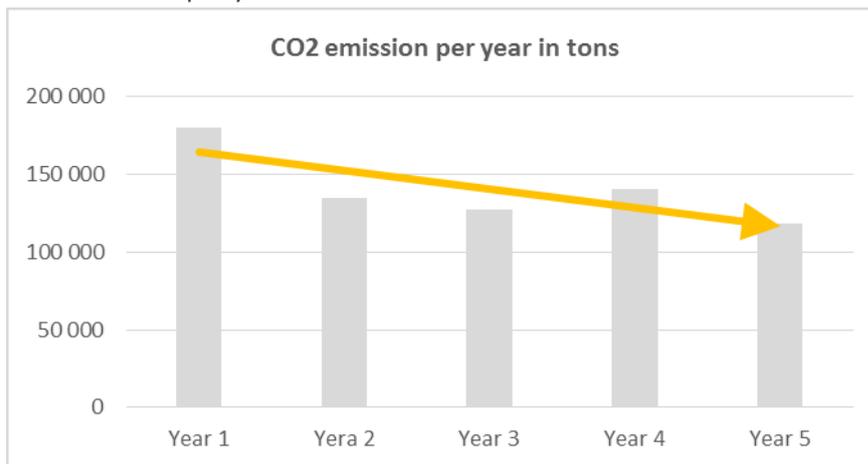
Year 5 objectives: 118 000 tons

To monitor the reduction of energy consumption (G4-EN6)

- Energy reduction:
    - o Report the amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives
    - o Report the types of energy included in the reductions: fuel, electricity, heating, cooling, and steam

ENVIRONMENT REPORTING

To monitor the energy consumption *(G4-EN3)*

- Energy consumption:
    - o Report total fuel consumption from non-renewable sources in joules or multiples, including fuel types used
    - o Report total fuel consumption from renewable fuel sources in joules or multiples, including fuel types used
    - o Report in joules, watt-hours or multiples, the total: electricity consumption; heating consumption; cooling consumption; steam consumption
    - o Report total energy consumption in joules or multiples
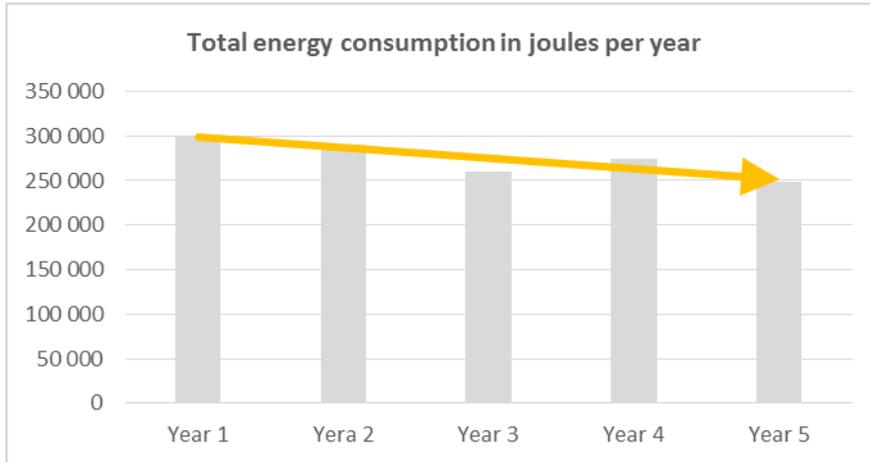
- % of material used that are recycled input material

Materials, Waste and Chemicals management: what can you report?

To monitor the non-hazardous substances and waste management policy

- % of waste recycled or reused
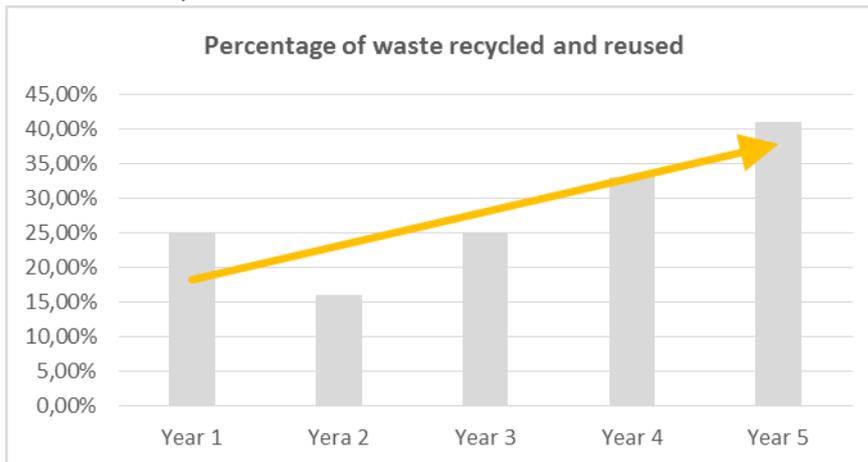
- Kilos or tons of waste collected

To monitor the hazardous substances and waste management policy

- Reduction of hazardous substances in percentage in the product
- Nox, Sox and other significant air emissions *(G4-EN21)*
- Waste of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel convention *(G4-EN25)*
- % of employees trained over the exposed population *(G4-EN2)*

Water management: what can you report?

To monitor the water consumption
- Total water withdrawal by source *(G4-EN8)*
- Water sources significantly affected by withdrawal of water *(G4-EN9)*
- Water consumption

To monitor the wastewater management policy
- Percentage and total volume of water recycled and reused *(G4-EN10)*
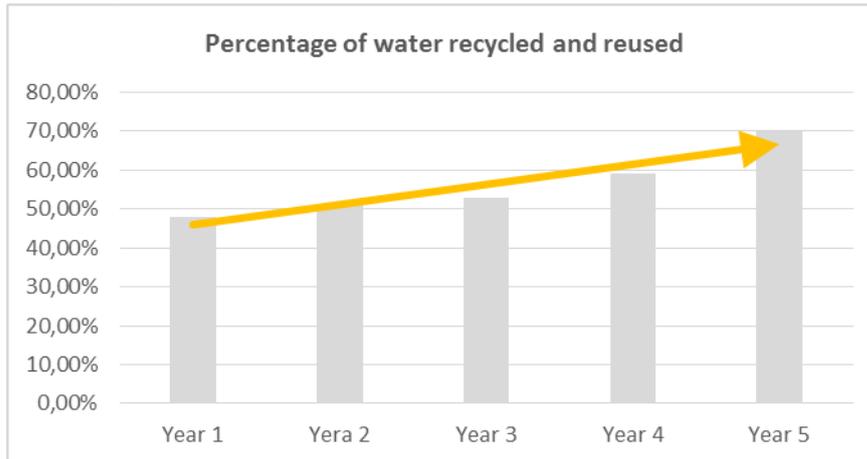
Product use and end-of-life measures: what can you report?

To monitor the environmental impact of the products and services
- % of products recycled or collected
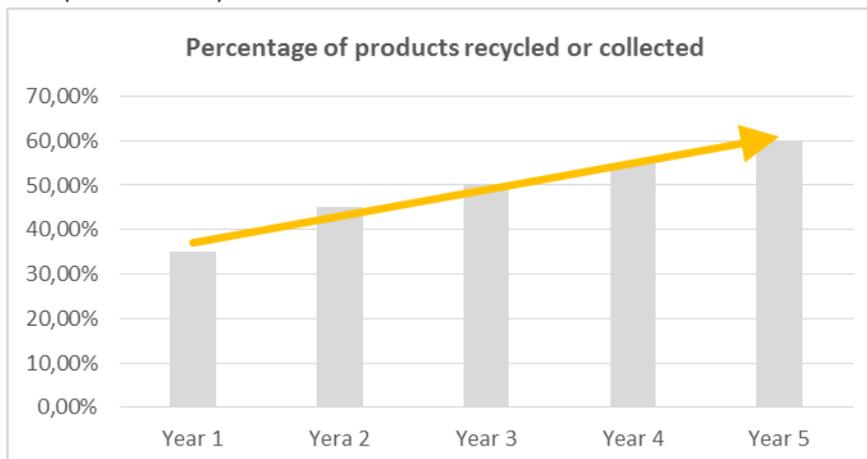
- Energy consumption of the product during use

To monitor the impact mitigation of environmental impacts of products and services (G4-EN27)
- o Report quantitatively the extent to which environmental impacts of products and services have been mitigated during the reporting period
- o If use-oriented figures are employed, report the underlying assumptions regarding consumption patterns or normalization factors

LABOR PRACTICES POLICY

ecovadis SUSTAINABLE SUPPLY MANAGEMENT **| Improvement areas** ⚠

- *Basic employees health & safety policy*
- *Basic labor practices and human rights policies*
- *Claims policies on all major labor issues but no supporting documentation*

WHY A POLICY?

Set clear objectives and specify employees' rights

Prioritize the impacts to address

Reminder: Before drafting the policy, your company should identify the most relevant issues at stake according to its profile. Best practice: set quantitative targets.

What you can address in your Labor and Human Rights Policy:

LABOR

Employee Health & Safety

Health and safety issues encountered by employees at work i.e. during operations and transport. It includes both physiological and psychological issues arising from, among others, dangerous equipment, work practices and hazardous substance (source: EcoVadis). **Health and safety is a major issue**.

- ✓ **Occupational safety:** worker exposure to potential safety hazards such as electrical and other energy sources, fire, vehicles, and fall hazards (*source: Electronic industry citizenship coalition or EICC*).
- ✓ **Industrial Hygiene**: worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures *(source: EICC).*
- ✓ **Sanitation, Food, and Housing:** providing workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities, etc. *(source: EICC).*
- ✓ **Emergency Preparedness**: identifying/assessing potential emergency situations and events, and minimizing their impact by implementing emergency plans and response *(source: EICC).*
- ✓ **Machine Safeguarding**: evaluating production and other machinery for safety hazards *(source: EICC).*

Tower climbing and high voltage require specific focus in your company's policy

Hazardous substance require specific focus in your company's policy

Working conditions

- ✓ **Working hours**: workweeks (which is not to exceed the maximum set by local law and must not be more than 60 hours per week, including overtime, except in emergency or unusual situations), and days off (workers shall be allowed at least one day off every seven days) (*source: EICC*).
- ✓ **Remuneration and social benefits**: minimum wages, overtime hours and legally mandated benefits; compensation for overtime (which should be at pay rates greater than regular hourly rates). Deductions from wages as a disciplinary measure shall not be permitted *(source: EICC).* It also contains work-life balance and healthcare programs *(source: EcoVadis)*

One of the major issues to deal with in your company's policy is working hours

Career Management & Training

- ✓ Regarding employee career management, your company must address main career stages in the Labor and Human Rights Policy, i.e**. recruitment, evaluation, training** and management of **layoffs** (*source: EcoVadis*). Your company should be transparent and non-discriminatory **during all these stages.**

Social dialogue

Deals with structured social dialogue i.e. social dialogue deployed through recognized employee representatives and collective bargaining *(source: EcoVadis).*

✓ **Structured social dialogue:** includes all types of negotiation, consultation or simply exchange of information between, or among, representatives of governments, employers and workers on issues of common interest relating to economic and social policy *(source: International Labor Organization or ILO).*

HUMAN RIGHTS

Discrimination

✓ **Discrimination issues at work***:* discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, termination; based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age *(source: EcoVadis).*

Forced Labor / Child Labor / Fundamental Human Rights

✓ **Fundamental Human Rights:** this includes the respect of security, property rights, employees privacy rights, civil and political rights, rights to freedom of association and collective bargaining, social and cultural rights (including indigenous people) as well as the prevention of harassment, moral and physical violence and inhumane or degrading treatment *(source: EcoVadis).*
✓ **Forced Labor:** forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services *(source: EICC).*
✓ **Child Labor:** the term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest *(source: EICC).*

⚠ Forced Labor and Child Labor issues are especially important in countries considered to be risky on the matter, such as in Southern Asia and Latin America.

Don't forget!

☐ **Dedicated responsibilities**   ☐ **Scope of application**   ☐ **Policy issue date**

☐ **Logo of the company**   ☐ **Signature of the management**

EXAMPLE OF AN HEALTH AND SAFETY POLICY

The health and safety policy misses core elements such as dedicated responsibilities, signature of the CEO. It remains general as it does not define all major elements and does not define targets. This example was chosen because health and safety are major issues. Your company needs to address health and safety issues related to its profile and relevant to your sector, size and location.

Our Policies

Celestica

Missing: dedicated responsibilities are not defined

Satisfactory: it contains the logo

1. OUR GLOBAL HEALTH AND SAFETY POLICY

At Celestica, our Health and Safety policy is the foundation of our global health and safety programs. The policy communicates our focus and continued commitment to the prevention of occupational illness and injury.

At Celestica, we commit to:

Satisfactory: it contains the scope of application

- Acting responsibly with respect to conditions that impact health and safety. All employees are expected to work safely and report any unsafe or unhealthy conditions.

Satisfactory: emergency preparedness is mentioned

- Communicating safe work practices and procedures to all persons working at Celestica and ensure appropriate action is taken if any employee or contractor engages in an unsafe act or fails to comply with stated requirements.
- Maintaining a safe and healthy workplace. The implementation, maintenance and performance of health and safety programs are the responsibility of every manager and supervisor at Celestica and all employees must participate to ensure a safe and healthy workplace.
- Setting health and safety objectives and targets each year, based on the previous year's results and trends.
- Continually improving our occupational health and safety (OHS) performance, OHS management system and our efforts to eliminate foreseeable hazards.
- Complying with applicable legislation, regulations and other requirements.
- Conducting rigorous self-assessments and audits to ensure our compliance with this policy on an ongoing basis.

Missing: the targets are not specified

Missing: the managers' signatures

Satisfactory: it mentions occupational health and safety

Missing: it does not define occupational health and safety

Missing: the policy does not mention hazardous substances management), work practices (sanitation, food, and housing)

HEALTH AND SAFETY ACTIONS

ecoVadis | Improvement areas ⚠

SUSTAINABLE SUPPLY MANAGEMENT

- *No information on health & safety measures*
- *Declares OHSAS 18001/SA 8000 certification but no supporting documentation*
- *Declares measures on health and safety but no supporting documentation available*

RISKS MANAGED	OPPORTUNITIES
Avoid work/occupational accidents	Value to customers (obtain OHSAS/18001 or SA 8000 certification)
Reputation impacts	Increased productivity (reduced absenteeism and production disruptions)

These actions are especially important for these firms due to their activities, but they remain an important topic to be addressed by all companies.

What is occupational health and safety?

Occupational safety and health (OSH) is generally defined as the science of the anticipation, recognition, evaluation and control of hazards arising in or from the workplace that could impair the health and well-being of workers, taking into account the possible impact on the surrounding communities and the general environment (*source : International Labor Office, or ILO*).

You will find below three types of actions: preventive actions (make sure that risks do not occur); correction (eliminate risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTIONS:

1) Prevention plan 2) Health and safety training 3) Physical protection for workers

OBJECTIVE
1) Establish a plan that specifies the risks related to each activity/operation and how to prevent them; 2) Provide personal protective equipment 3) Train workers on health and safety issues

WHY
To prevent any incident

WHO
SA: everyone, especially workers and mechanics. Actors: management

HOW
1) Draw up plans specific to each operation and make sure each worker is aware of the risks before starting; 2) Equip workers for each operation; 3) Organize e-learning / on-site training courses

CORRECTION:

Emergency procedure

OBJECTIVE
Procedure specifying what to do in the event of an incident

WHY
To avoid casualties and material damages

WHO
SA: all employees
Actors: management, QSE managers

HOW
Draw up a synthetic, straight-to-the-point procedure and display it on the walls of the workplace

MONITORING:

Audit

OBJECTIVE
External audit on health and safety actions

WHY
To control that health and safety actions are implemented; to obtain OHSAS/18001 or SA 8000 certification

WHO
Actors: auditors, QSE manager, Health and Safety Committee; SA: the company

HOW
Conduct one-off audits (external auditors)

HEALTH AND SAFETY ACTIONS

EXAMPLE: WHAT IS A RISK-MAPPING SHEET?

This example was chosen to help your company understand what it should contain and how it should be organized. The aim of the risk assessment process is to remove a hazard or reduce the level of its risk by adding precautions or control measures, as necessary. By doing so, your company creates a safer and healthier workplace (source: Canadian Centre for Occupational Health and Safety).

Satisfactory: name the task, the scope of work, the schedule of the task, the job supervisor, date of approval

Satisfactory: divide risk mapping into three steps: identify, evaluate and manage

Satisfactory: remind the procedure to follow when organizing a task

PRE-JOB PLANNING/PROJECT RISK ASSESSMENT WORKSHEET

Asset Area: Mid-West   Location ID: Juniper   Scope of Work: Civil Construction of Well Pad   Job Supervisor: D. Smith
Participants: See Sign-In Sheet of Attendees   Date of Assmt.: 2/09/2011   Approved by: M. Smith   Date Approved: 3/31//2011
Post-job Review Date: 4/15/2011   Post-job Review Led By: T. Findlay

Procedure:
1) Review SOW & identify key job phases
2) Identify hazards and consequences for each key activity within the job phase
3) Assess existing HES controls - Lo/Med/Hi
4) Assess confidence that controls will be
5) Determine risk ranking from matrix
6) Identify additional controls to lower risks
7) Assign responsibility and date for controls
8) Have RA approved by supervisor of PIC
9) Perform post-job review

#	Job Phase	Key Activity(s)	Hazards	Potential Consequences	In Place / Available (H/M/L)	Description	Impl. Confid. (H/M/L)	Risk Ranking	Action Required	Control Hierarchy (Number)	Responsible Person	Due By (date)	Verified By (initials)
			1) IDENTIFY		**2) EVALUATE** Existing HES Controls				**3) MANAGE** Additional Risk Mitigation Actions				
1	Planning	Permitting - Surface User Agreement (SUA), State Application for Permit to Drill (APD), Survey etc.	Not in Compliance, Landowner Relationship, Incorrect Setup Location	Citation and/or delay in obtaining needed permits.	H	Weekly update from regulatory group; Consistent SUA design & content.	H	Low	1.) Verify SUA with land and regulatory department - Final SUA Pending. 2.) Stormwater Pollution Prevention Plan (SWPPP) 3.) Confirm with Drilling dept. that pad civil design addresses their needs.	4	1.) G. Smith 2. D. Bower 3.) B. White	2/16/2011	ds
2		Survey	Improper site build, Not in Compliance, producing well pad, rotating equipment, tanks venting gas, leaks, spills, unfamiliarity with active equipment including tools & equipment evaluations, SIMOPS, Unqualified Contractor	Citation and/or delay in obtaining needed permits, injury, exposure to combustable gases or liquids, Introduction of ignition source to production operations	H	Onsite review and expectations from PIC with land and surveyors, regulatory review of plats, Survey companies both exisiting contractors with prior experience,	H	Low	Verify with land and regulatory department to confirm latest plats are in hand.	4	D. North	2/16/2011	ds
3	Mobilization	Contractor on boarding compliance, Equipment delivery (Semi Trucks & Construction Equip.)	Non-compliance with contractor onboarding process, producing wellpad, rotating equipment, tanks venting gas, leaks, spills, truck traffic on producing pad, possible workover activity, chemicals, High Profile Equipment, Unfamiliarity with HES policies, Inexperience to reclamations, SSE, Site specific hazards (poles/anchors, etc.), Site visitors, SIMOPS, Equipment securing, cold/wet weather	Inadequate resources, delay, exposure to combustable gases or liquids, Incident	M	Construction company will be moving from previous project with many of the same crew members, Tailgate Sfety Meeting (TGSM), TGSM review process to identify those in need of orientation, Equipment status checklists, Flame Retardant (FR) Clothing, Personal Area Monitors(PAM), Boomer Policy, Prior Experience, CB Radio Communication,	H	Moderate	1.) Confirm status of crew orientations; 2.) Identify & set exclusion area on producing pad; 3.) Provide phone list to Contractor for notifications (Q&A and SIMOPS), 4.) Verify route clearance under electrical utilities; 5.) Traffic Control Program 6.) Identify safe fueling area (including enviro concerns).	4	1.) R. Rogers 2.) Z. Ali, 3.) D. Smith 4.) B. White 5.) R. rogers, 6) C. Howard	2/16/2011	ds
4		Pre-Construction onsite	Weather, Travel, Producing location, landowner concerns, Unfamiliarity with HES&S Policies, SIMOPS	Delays, accident, injury, and incident, and damaged relationships,	H	Weather advisories, Road reports, Existing civil build system includes onsite meeting and confirmation of ND one-call, land department present at Pre-Con meeting, Orientation - PPE (FRC, H2S)	H	Low	1.) Include members of the production team; 2.) Pre-Notification to NDIC	4	C. Howard	2/16/2011	ds
5	Civil Construction	Remove Snow from Location	Weather, Stormwater controls, landowner concerns, Truck traffic on producing pad, Possible workover activity, working with heavy equipment, slips, trips, falls, buried obstacles, tanks venting, leaks, Fueling operations, Maintenance of heavy equipment, Ignition sources(generators, cutting torch, drills, prox to equipment chemicals, etc.)	Delays, frostbite, spring runoff/run-on issues, damaged relationship, livestock, injury, leaks, damage to unseen equipment or snow removal equipment, possible high level LEL/H2S, spills, possible fire or explosion, Incorrect placement of snow piles	M	Weather advisories, daily site assessment, review of site plan by enviro professional, snow removal maps, land professional review of concerns at pre-construction meeting, ND One Call, TGSM, Windsock, PAM's, FR clothing, Hot work permits, PreStart Up Inspection, Excavation Safety CHecklist	H	Moderate	1.) Provide phone list to Contractor for notifications, 2.) Identify acceptable work/exclusion areas, 3.) Refresh ND One-Call every 10 days (Darrell N), 5.) Identify snow pile locations, 6.) Identify supervisory needs, 7.) Stop all R/M & R/O Activities	4	R. Rogers, Z. Ali, C. Howard, and B. Brown.	2/16/2011	ds
6		Move existing Topsoil/spoil piles / Strip Topsoil and stockpile / Excavation and stockpile spoil / Build fill slopes / Pit Excavation	Weather, Stormwater controls, landowner concerns, Truck traffic on producing pad, Possible workover activity, working with heavy equipment, slips, trips, falls, buried obstacles (electric and flowline utilities), tanks venting, leaks, Fueling operations, Maintenance of heavy equipment, Ignition sources(generators, cutting torch, drills, etc.), Working on Slopes, Traffic, SIMOPS	Incident, delays, frostbite, spring runoff/run-on issues, damaged landowner relationship, livestock, injury, leaks, damage to unseen equipment or heavy equipment, possible high level LEL/H2S, spills, posssible fire or explosion, Incorrect Placement of topsoil/spoil piles & Snow. SWPPP violation, Change in Soil Conditions due to weather	M	Excavation Checklist, Weather advisories, daily site assessment, review of site plan by environmental professional, snow removal maps, land professional review of concerns at pre-construction meeting, North Dakota One Call, TGSM, Windsock, PAMs, JSA, FR clothing, Hot work permits	H	Moderate	1) Identify location of topsoil/spoil/snow piles storage 2) Identify surface encombants needing to be stablized, 3) Install set-screw side cleat for equipment to work on steep slopes 4) Notify NDIC prior to lining pit.	4	1 & 2) D. Smith 3 & 4) B. White	2/16/2011	ds
8		Surface Location	Long haul on bad roads, Weather, landowner concerns, working with heavy equipment, slips, trips, falls, leaks, Fueling operations, Increased traffic through producing pad, Drivers unfamiliar with producing pad risks (smoking, rotating equipment, tank venting, etc.), SIMOPS, Haul Traffic deliverying Scoria, Road Conditions/poor visibility, Truck Speed	Delays, frostbite, spring runoff/run-on issues, damaged relationship, livestock, injury, leaks, damage to unseen equipment or heavy equipment, possible high level LEL/H2S, spills, posssible fire or explosion, Vehicle Incident, Open Excavation, DIfferences in walking surfaces (large agregate vs. small)	M	Weather advisories, daily site assessment, review of site plan by enviro. professional, snow removal maps, land professional review of concerns at pre-construction meeting, ND One Call, TGSM, Windsock, PAM's, FR clothing, Back-Up Alarm on heavy equipment (Audible & Visual), Current experience & PJ/TG	H	Moderate	1.) Multiple PJ/TG discussions 2.) Daily inspection of site by supervisor (including walking / working surfaces)	4	C. Howard	2/16/2011	ds

EXAMPLE: WHAT IS AN EMERGENCY PROCEDURE?

This example was chosen because it might help save lives and avoid major damages. An emergency plan specifies procedures for handling sudden or unexpected situations. The lack of an emergency plan could lead to severe losses such as multiple casualties and possible financial collapse of the organization. An emergency plan specifies procedures for handling sudden or unexpected situations.

Examples of technological hazards are:
- Fire / Explosion
- Building collapse
- Major structural failure
- Spills of flammable liquids
- Accidental release of toxic substances
- Deliberate release of hazardous biological agents, or toxic chemicals
- Loss of electrical power
- Loss of water supply
- Loss of communications

Areas where flammables, explosives, or chemicals are used or stored should be considered as the most likely place for a technological hazard emergency to occur.

Having identified the hazards, the possible major impacts of each should be itemized, such as:
- Sequential events (for example, a fire after an explosion)
- Evacuation
- Casualties
- Damage to plant infrastructure
- Loss of vital records/documents
- Damage to equipment
- Disruption of work

Based on these events, the required actions are determined. For example:
- Declare emergency
- Sound the alert
- Evacuate danger zone
- Close main shutoffs
- Call for external aid
- Initiate rescue operations
- Attend to casualties
- Fight fire

The final consideration is a list and the location of resources needed:
- Medical supplies
- Auxiliary communication equipment
- Power generators
- Respirators
- Chemical and radiation detection equipment
- Mobile equipment
- Emergency protective clothing
- Firefighting equipment
- Ambulance
- Rescue equipment
- Trained personnel

ecoVadis | Improvement areas ⚠

SUSTAINABLE SUPPLY MANAGEMENT

- *Declares measures on working conditions (remuneration, working hours, benefits) but no information available*
- *No information on working conditions*

When you are based in risky countries, one of the major issues to deal with is working hours.

RISKS MANAGED/OPPORTUNITIES

Avoid legal claims from employees

Enhance employee productivity and satisfaction

What are working conditions?

Working conditions are at the core of paid work and employment relationships. Generally speaking, working conditions cover a broad range of topics and issues, from working time (hours of work, rest periods, and work schedules) to remuneration, as well as the physical conditions and mental demands that exist in the workplace (*source: International Labor Organization*).

You will find below three types of actions: inform (be transparent regarding the measures implemented); manage (implement measures to avoid risks); monitor (control that risks are managed).

INFORM

OBJECTIVE
Specify and inform clearly and transparently employees about their rights on **1**) Remuneration 2) Social benefits 3) Working hours and leaves

WHY
Allow employees to enact their rights

WHO
SA: employees
Actors: HR Department & management

HOW
Be transparent during the recruiting procedure and give to the employee a welcome booklet or set an information meeting

MANAGE

OBJECTIVE
Provide employees with the announced conditions

WHY
Enhance employee satisfaction and productivity

WHO
SA: employees
Actors: HR department, Employee representatives

HOW
Examples 1**)** Remuneration: profit sharing plan 2) Social benefits: lunch or holiday vouchers 3) Working hours and leaves: flexible hour schemes

MONITOR

OBJECTIVE
Monitor performance and compliance

WHY
To check if rules are applied

WHO
SA: employees, especially in risky countries
Actors: internal compliance officers or external independent auditors

HOW
Documentary audits or on-site audits

One-time or frequent audits

EXAMPLE OF AN EMPLOYEE PROFIT SHARING AGREEMENT

The employee profit sharing agreement below covers most expected items: it dates and identifies the different parties involved in the agreement, it establishes clearly the frame to implement the agreement through different points, and it takes into account the law.

The missing element is the additional signature of one or more witnesses with their name, title and address specified.

The template of an employee sharing agreement has been chosen as an example because it is a great way to involve employees in the company and enhance their satisfaction and productivity.

Satisfactory: the agreement is dated and specifies the parties involved

This Agreement is made and effective this [date], by and between [place company name and address here] hereinafter referred to as "employer" and [place employee name, age, and address here] hereinafter referred to as "employee."

The employer has offered employment to the employee based on the offer letter issued on [specify date of offer letter]. The employee has accepted the offer and joined the services of the employer on [date] by executing a contract of employment [specify reference number] dated [specify date].

The employer and the employee now mutually agree to the following schedule for the financial distribution of net profits generated by [specify name of the company or unit with address], hereinafter referred to as the "company."

1. The employer agrees to pay the employee an incentive salary equal to [mention the applicable incentive pay rate] of the net profits of the company for the fiscal year, subject to a maximum of [specify the maximum amount of incentive salary payable in figures and words].

2. The net profits of the company for the purpose of this agreement is the net profits generated by the company after state income taxes, contribution to pension funds, and deduction of any extraordinary gains or losses on disposition of assets, and is based on the income statements prepared by the company under generally accepted accounting practices. The determination of net profit by the company or its authorized representative shall be final and binding on the employee.

Satisfactory: the agreement establishes clearly the frame of implementation of the agreement

3. The employer shall pay the employee the applicable incentive salary within thirty (30) days after the company's independent accounting firm concludes its audit of the financial statements. In the eventuality of the independent accounting firm not completing the final audit 90 days after the end of the fiscal year, the company shall make a provisional payment equal to fifty percent (50%) of the estimated incentive salary, based on the un-audited financial statements. The company shall deduct such provisional payment from the actual incentive salary pay out for the fiscal year.

4. The payment of incentive salary will start with the company's year-end [list first year of incentive salary] and continue each fiscal year thereafter during the term of this agreement.

5. The employee becomes eligible to receive the incentive salary only if the employee attends work or remains in the payroll of the company for at least [specify number of days] days in the applicable fiscal year. The company shall deem the employees authorized leave of absence, weekly days off, and approved company holidays as working days for computing incentive pay.

6. The employee becomes ineligible to receive any incentive salary if the employee breaches any material obligation owed to the company, habitually neglects the work duties, engages in dishonest conduct, damages the reputation or standing of the company, and / or engages in any criminal act or acts of moral turpitude. This is without prejudice to any other action the company may take at its discretion and/or any other action per other agreements or laws in force.

7. This agreement remains valid only during the period the employee is in the service of the company. If the employee resigns, is terminated, or ceases to be in the payroll of the company for any reason whatsoever, the agreement shall automatically cease to be valid from the date the employee is removed from the rolls of the company, and the employee shall become ineligible for any further payout of incentive salary from such date.

8. The employer has the right to discontinue this agreement, or alter the terms and conditions at any time at its discretion, by providing the employee with a notice of 30 days of the intention to do so.

9. This agreement terminates and supersedes all prior understandings or agreements on incentive salary.

10. This Agreement shall be construed and enforced in accordance with the laws of the state of [list state of governing law].

IN WITNESS WHEREOF, the parties have hereunto signed this agreement this

_____day of _____, 20_____.

Satisfactory: the agreement complies with the local legislation

[Employer signature, name, and designation]   [Employee signature, name, and designation]

Missing: the signature, name, title and address of one or more witnesses

EXAMPLE OF AN EMPLOYEE HANDBOOK

The employee handbook working hours' section below covers most expected items: it clearly established hours and days when the employees have to work and specifies core working hours, as well as lunch time. It also specifies the policy implemented for specific cases such as part time employees.

The missing elements are a reminder of the local legislation and the number of days off.

Please note that it is up to users to adapt, modify and customize the document to suit the particular needs of their organization while ensuring compliance with local employment standards and legislation.

As a reminder, according to the EICC, a workweek should not exceed 60 hours including overtime. Workers shall be allowed at least one day off every seven days.

The working hours' section of an employee handbook has been chosen as an example because it is a very important subject for companies, especially in risky countries.

EMPLOYEE HANDBOOK

This employee handbook is a summary of policies, procedures and practices related to human resource management at [THE ORGANIZATION].

Satisfactory: the core working hours and days are clearly specified

Missing: the number of days off are not clearly specified

Hours of Work

The regular office hours for [THE ORGANIZATION] are [HOUR] a.m. to [HOUR] p.m. [DAY] through [DAY] inclusive (excluding holidays), with core operational hours being [HOUR] a.m. to [HOUR] p.m. During core hours, it is expected that most staff will be available. All employees are expected to work XXX hours per day, which include those hours indicated as core, exclusive of an unpaid eating break of at least XXX minutes. Employees may also be expected to work such other hours as may be requested or required, from time to time. Employees hired on a part time basis will have schedules determined on a case by case basis.

Satisfactory: the policy implemented for specific cases is also described

Employees are required to notify their supervisor, in advance, of planned days away from the office. Unplanned absences from the office should be reported to the employee's supervisor as soon as could reasonably be expected. At the discretion of the Executive Director, depending on circumstances, employees may be allowed to work from home for specific periods of time.

Missing: a paragraph reminding local law about workweek

CAREER MANAGEMENT ACTIONS

ecovadis | Improvement areas ⚠

- *Declares measures on career management and training topics but no public information available*
- *No monitoring of average hours of training per employee*
- *No information on mechanisms in place regarding career management*

RISKS MANAGED/OPPORTUNITIES

Avoid a deteriorate social climate and skill shortage

Increased productivity (increased motivation and reduced turnover)

What is career management?

Career Management can be defined as the process that plans and shapes the progression of individuals within an organization in accordance with the organizational needs and objectives, employees' performance potential and their preferences (i.e.: the integration of the individual's objectives with those of the organization) (*source: Public Service Commission SA*).

You will find below three types of actions: inform (be transparent regarding the measures implemented); manage (implement measures to avoid risks); monitor (control that risks are managed).

INFORM

OBJECTIVE
Have detailed procedure with objective criteria; detailed job description; justified layoff notice

WHY
To avoid legal claims and high turnover as a effect of unsatisfied employees

WHO
SA: employees
Actors: HR department, Management

HOW
Be transparent during the recruiting or the lay-off procedures, about career options and training

MANAGE

OBJECTIVE
Have a suitable training plan that matches the needs of the company's employees

WHY
To match the employees' requirements and develop their skills

WHO
SA: employees
Actors: HR department, management, internal or external trainers

HOW
On-line or on-site training sessions related to employees' interests followed up by training plans

MONITOR

OBJECTIVE
Evaluate employees' individual performance on objective criteria

WHY
To enhance productivity and target new requirements

WHO
SA: employees
Actors: HR department, management

HOW
Organize employees' regular evaluation (at least once a year) of individual performance

EXAMPLE OF AN EMPLOYEE PERFORMANCE EVALUATION

The evaluation below covers most expected items: it dates the evaluation, gives dated global and specific objectives for the employee, evaluates precisely the employee current skills and offers actions in order to meet unachieved objectives. It has been chosen as it shows a concrete tool to monitor career management efficiently.

The missing elements are a list of criteria taken into account during the evaluation and a description of evaluation procedures, as well as an explanation of recommended actions' implementation procedures.

Satisfactory: of the employee's skills evaluation is accurate and thorough

Satisfactory: it sets dated global and specific objectives

Satisfactory: the evaluation is dated

Professional Development Plan Template

Date: 1 October 2014_____

Name: _____

Direct Report: _____

Current Role: Electrical Engineer_____

Career Track (1-3 years): Plant Manager of _____ in 3 years

PD objective in next 12 months: To gain experience in managing teams and also understand budgets, financial management and business planning concepts and drivers.

Current strengths, weaknesses, issues and gaps in achieving career objective	Actions needed to meet objective	When
1. Strengths: Very well developed estimator and designer Strong industry networks Highly experienced with strong problem solving and technical expertise Personable and effective communicator	NA	NA
2. Weaknesses: Limited people management experience No financial, budgeting and reporting experience	Appoint business mentor (internal person) to provide a sounding board on people management issues. Refine reporting lines to include line management responsibility of maintenance team (5 trade staff and their supervisor). Enrol in online (and assisted) business and financial management principles and basics course. Provide finance manager as a tutorial buddy.	By 1 November 2014 By 1 January 2015 By 1 March 2015
3. Issues: Fly in fly out from Perth (office based in Sydney) Family time pressures – hard to extend hours for development outside normal job	Provide access to a graduate engineer for support and lower level tasks.	By 1 January 2015
4. Gaps: No formal management qualification	To be addressed based on progress with other actions above.	Monitor and revise by 30 June 2015

Staff member _____ Date _____

Manager _____ Date _____

Manager _____ Date _____
(once removed)

Satisfactory: actions are suggested to meet unachieved objectives

Missing: a description of the evaluation procedure and criteria, as well as an explanation of the recommended actions implementation procedure

SOCIAL DIALOGUE ACTIONS

ecovadis SUSTAINABLE SUPPLY MANAGEMENT | **Improvement areas** ⚠

- *No collective bargaining agreement*
- *No employees covered by collective agreement*
- *No information on % of employees covered by collective agreement*

⚠ The most important item is to have a local employee representative at least.

RISKS MANAGED/OPPORTUNITIES
Reputation impacts
Prevention of crises and strikes
Enhance employee productivity

What is social dialogue?

Social dialogue mainly takes the form of collective bargaining, which is the process of bargaining between representatives of workers and employers. This bargaining is undertaken to determine working conditions and terms of employment, and to regulate relations between employers, workers, and their representatives. Collective bargaining is broadly considered to include all interactions between parties negotiating a collective employment agreement. This includes all communications and correspondence before, during and after negotiation.

What is a collective agreement? A collective agreement is the formal agreement between an employer and their employee(s) following bargaining. This agreement details the duties of both parties, and regulates the terms and conditions of employees in their workplace *(source: dol.gov.nz)*.

You will find below three types of actions: inform (make sure that employees are well informed); manage (implement measures to avoid risks); control (control that risks are managed).

INFORM

OBJECTIVE
Inform staff of the existence and right to resort to employees' representatives

WHY
To help employees use their rights

WHO
SA: everyone is concerned
Actors: management, employee representatives

HOW
Mailings, posters, information meetings

MANAGE

OBJECTIVE
Ensure efficient collective bargaining

WHY
To ensure communication between employees and Management

WHO
SA: everyone is concerned
Actors: management, employee representatives

HOW
Organize elections, sign collective agreements, organize meetings, and appoint a middleman

MONITOR

OBJECTIVE
Control that social dialogue measures are implemented

WHY
To make sure that employees have access to their rights

WHO
SA: the company
Actors: internal or external auditors

HOW
Conduct one-off audits (external auditors) and permanent controls (internal controllers)

HOW CAN YOUR COMPANY PROCEED?

Employee representation can bring considerable benefits, which are especially manifest in the case of information and consultation. The key to successful employee representation is to have a local/employee representative. Their role is to become a middleman between management and employees to discuss any potential issue related to working conditions, health and safety, human rights.

How to choose employee/local representative?

Employee representatives need to be genuinely representative of your staff, which normally means holding elections but it can be other mechanisms according to your profile. Furthermore, the arrangements need to be transparent and acceptable to employees, with the outcomes seen to be demonstrably fair.

What your company needs to think about
☐ How many representatives does your business need to have to make sure that all groups are represented?
☐ Should all employees be represented as one workforce, or groups depending on the level of employee?
☐ How often will you need to have changes is local/employee representatives?
☐ How can you encourage your employees to get involved and stand as candidates?
☐ How can you make sure that the election/choice process is fair and open to ensure the outcome is what your employees want?

Best practice
☐ So far as possible, make sure voting is done in secret
☐ Prove that votes given are accurately counted
☐ Make sure employees are able to vote for as many candidates as your company decided are needed to represent them. For example, if your company has stated that there needs to be three employee representatives then employees should be able to vote for three candidates.
☐ The number of employee representatives should be reasonable having regard to the size of your company.

After the choice
Following notification of the appointment of an employee representative, your company should provide the representative with relevant information about the normal procedures for communicating with the appropriate representatives of management.

What if a representative leaves?
If an employee representative leaves, or decides not to continue with the role, another election or choice procedure should be held to replace them.

HUMAN RIGHTS ACTIONS

ecovadis | Improvement areas ⚠️

- *No implementation measures in place regarding discrimination/fundamental human rights/ child & forced labor*
- *Declares measures on discrimination/fundamental human rights/ child & forced labor issues but no supporting document*

RISKS MANAGED	OPPORTUNITIES
Reputation impacts	Decrease employees turnover and improve productivity
Legal claims	Strengthen stakeholders' trust

⚠️ If your company is located in one risky country, you should pay close attention to these topics

What are human rights?

Here, Human Rights refer to discrimination, fundamental human rights and forced/child labor.
Discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, termination; based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age *(source: EcoVadis).***Fundamental Human Rights:** this includes the respect of security, property rights, employees privacy rights, civil and political rights, rights to freedom of association and collective bargaining, social and cultural rights (including indigenous people) as well as the prevention of harassment, moral and physical violence and inhumane or degrading treatment *(source: EcoVadis)*. **Forced Labor**: forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services **Child Labor:** the term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest *(source : EICC).*

You will find below three types of actions: preventive actions (make sure that risks do not occur); corrective actions (deal risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTIONS
OBJECTIVE
Raise awareness and train: define, explain, and provide case studies

WHY
To prevent and avoid human right breaches

WHO
SA: To everyone. At the very least: human resources and managers Actors: trainers, management, HR

HOW
1) On-line or on-site training 2) Formal partnership with external stakeholders

CORRECTION
OBJECTIVE
Report suspicious cases, deal with them and provide guidance to employees

WHY
So that management can handle & solve the cases and employees know what to do

WHO
SA: companywide to all employees Actors: HR or legal departments

HOW
1) Whistle blowing 2) Secure communication channel for employees to seek advice 3) Structure mechanisms to deal with violations 4) Disciplinary measures

MONITORING
OBJECTIVE
Internal or external audits

WHY
To check if rules are applied, to detect policy violations

WHO
SA: companywide Actors: Internal compliance officers or external independent auditors

HOW
Documentary audits or on-site audits

One-time or frequent audits

71

EXAMPLE OF WHISTLE-BLOWING PROCEDURE

This whistle-blowing procedure below covers most expected items: it mentions the scope of application and contacts, defines the different stages of the procedure, and reminds the rights of the whistle-blowers. The only missing element is the signature of the Chairman.

The whistle-blowing procedure has been chosen as an example because it is important for employees to know they can report any wrongdoings to their employer through a transparent and effective tool.

XXXX's Whistle-Blowing Procedure

This procedure applies to all employees, former employees and contract workers working with XXXX or its subsidiaries ('Workers').The purpose of this procedure is to provide a framework to promote responsible whistle-blowing. Whistle-blowing is the reporting by Workers of any malpractice or illegal act or omission by other Workers.

SCOPE OF APPLICATION

Satisfactory: scope of application is mentioned

The use of this procedure should be restricted to where you reasonably believe one of the following has occurred, is occurring or is likely to occur: a criminal offence, including fraud; disregard for legislation, particularly in relation to health and safety at work; malpractice, or ill treatment of a customer or supplier by a member of staff; serious damage to the environment; any other serious irregularity such as data theft or hacking; or deliberate concealment of any of the above.
Whistle-blowing should not be a route for raising malicious or unfounded allegations. Only those who use this policy in good faith will be protected under it.

TO WHOM NOTIFY THE CONCERN

The following persons are the Designated Officers under this procedure. They have direct access to the Chairman of XXXX: **R. B.** Email: xxxxxxxx@xxxxxxxx
H. M. Email: xxxxxxxx@xxxxxxxx

Satisfactory: designated officers' contacts are given

You can normally raise concerns about wrongdoing and malpractice with your immediate manager first, who will notify the matter to one of the Designated Officers.
If you consider it more appropriate to raise your concern, in the first instance, with a director of XXXX, other than the Designated Officers, then please do so and he or she will notify one of the Designated Officers.
If the matter is of a very serious nature, such as an allegation of fraud involving an XXXX director, or if it involves your immediate manager, you may notify one of the Designated Officers direct. You must include the words 'Whistle-blowing' in the subject heading of the email or letter you send.

Warning: it is simpler that the designated officer knows the whistle-blower's identity to contact her/him and to ensure there is no identity fraud and

THE INVESTIGATIVE STAGES

You may not make anonymous complaints to the Designated Officer, but your identity may remain confidential to the Designated Officer as far as reasonably practicable. Whether your statement will be written or oral, in either case the Designated Officer will write a brief summary of the interview, which will be agreed by both parties.
The Designated Officer will report to both the Head of the Compliance department or the Head of XXXX and the other Designated Officers, they will together decide on what further investigation, if any, should take place. They will report back to you within 10 working days of your interview or receipt of your complaint.
The investigation
The employee under investigation will not being informed until necessary. In certain other circumstances, the employee may have to be suspended pending the investigation. If the investigation shows there is a case to answer, the Company's Disciplinary Procedure will be invoked against the employee concerned. If there is found to be no case to answer, the Designated Officer will ensure that you are protected, provided the disclosure was made in good faith. Only where you are found to have made false allegations maliciously will the Disciplinary Procedure be invoked against you.
If the concern raised is very serious or complex, an inquiry may be held.
Following the investigation
The Designated Officer, possibly in conjunction with the Head, will arrange a meeting with you to give feedback on the investigation. The feedback will be provided within 10 working days of the conclusion of the investigation and any inquiry.
The law
This procedure is meant to complement any local legislation which protects Workers making good faith disclosures about certain matters of concern.

Satisfactory: reminds the whistle-blower's rights

Protection of whistle-blowers
XXXX will not tolerate any harassment, victimisation or discrimination of a good faith whistle-blower and will treat this as a serious disciplinary offence. The whistle-blower's rights against retaliation under any applicable legislation are fully recognised by XXXX.

Missing: the Chief Executive Officer's and designated officers' signatures

EXAMPLES OF DEDICATED ACTIONS

Apart from the general actions described below, that can concern all human rights breaches, there are dedicated actions that can be carried out for some human rights themes.

Discrimination

Your company can implement diversity programs.

Definition: Diversity is defined as "otherness or those human qualities that are different from our own and outside the groups, to which we belong, yet present in other individuals and groups." Dimensions of diversity include, but are not limited to: age, ethnicity, ancestry, gender, physical abilities/qualities, race, sexual orientation, educational background, geographic location, income, marital status, military experience, religious beliefs, parental status, and work experience" (Managing diversity in the workplace, Berkeley University)

Objective: to include these populations through dedicated resources and programs to attract them, hire them and make them stay in the company so that they can enrich teams with their skills and points of view.

Child labor

Your company can implement dedicated HR procedures.

The HR procedure must include

- A **definition** of "children" (their age)

- A **list of tasks** that they are prohibited to do

- A **control procedure**: how does your company check the age of young applicants? (Control of ID, passports,)

Forced labor

Your company can implement dedicated HR procedures.

This HR procedure must include

- A **definition** of "forced labor"

- A **list of examples** that are considered as forced labor (retaining the passports for instance) and that are prohibited

- A **control procedure:** how does your company check that there is no forced labour in the company? (Internal or external audits? HR controls during employment? Contracts?)

ecoVadis | Improvement areas ⚠

- *No monitoring/reporting of accident frequency rate*
- *Figure provided on accident frequency rate is surprisingly low*
- *No monitoring/reporting of accident severity rate*
- *Claims accident frequency rate of 0*
- *Less than X days of training in average per year and per employee*
- *No information on % of employees covered by collective agreement*
- *No employees covered by collective agreement*
- *No reporting on average hours of safety training per employee*
- *No reporting on health & safety indicators*
- *No reporting on labor practices and human rights issues*

WHY monitor KPIs?

Monitor labor practices performance

Implement new corrective and preventive actions to foster ongoing improvement

Don't forget!

- ✓ **Format: graphs and tables with sources**
- ✓ **Only report on implemented actions**
- ✓ **Recent data up to 2 years old**
- ✓ **Scope of application taken into account**

KPIs you can monitor in your Labor Practices and Human Rights Reporting:

According to your company activities, size or location, some criteria might be more relevant than others.

In general

- Total number of workforce by employment type, employment contract, and region, broken down by gender
- Total number and rate of new employee hires and employee turnover by age group, gender, and region *(G4-LA1)*
- Turnover rate (report the total number and rate of employee turnover during the reporting by age group, gender and region) *(G4-LA1)*

Health and Safety: what can you report?

In general

- Absenteeism rate *(G4-LA6)*
- % of total workforce represented in formal joint management-worker health and safety committees *(G4-LA5)*

To monitor health and safety training

- % of attendance
- % of risky population attendance
- Accident frequency rate with the following formula: number of accidents x 1,000,000 / number of hours exposed to risks *(G4-LA6)*
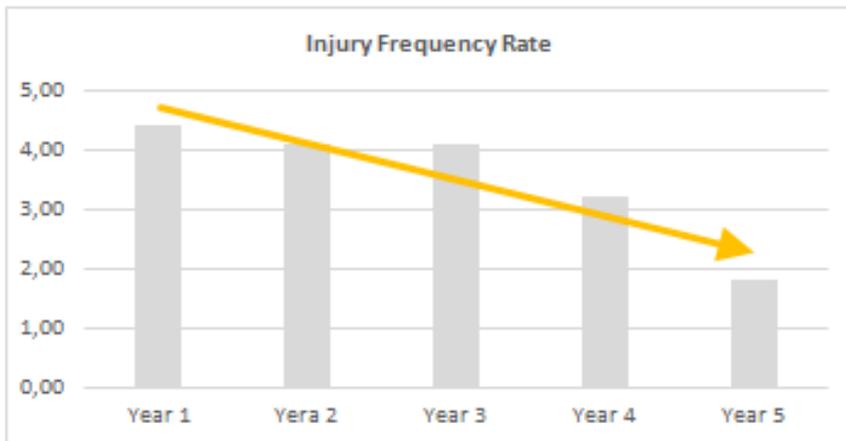
Year 5 objectives: 1.8

- Accident severity rate which can be calculated in various ways such as: the number of days lost due to injuries x 1,000,000 / total hours worked *(G4-LA6)*
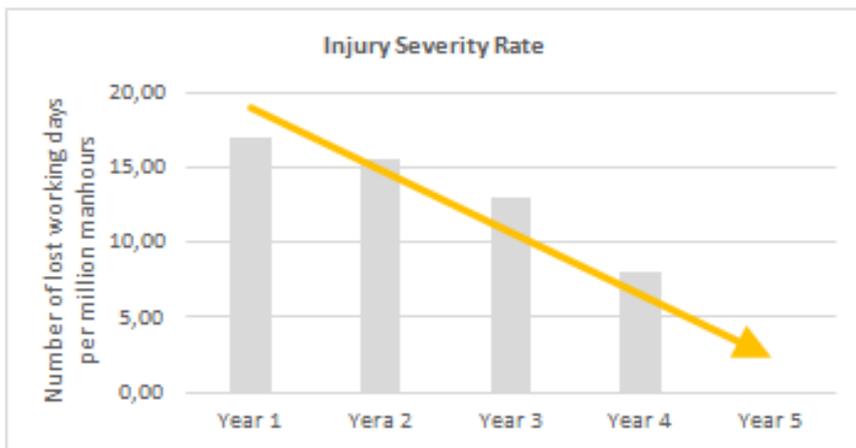
Year 5 objectives: 0

Working Conditions: what can you report?

To monitor implementation of working conditions measures

- % of leaves actually taken
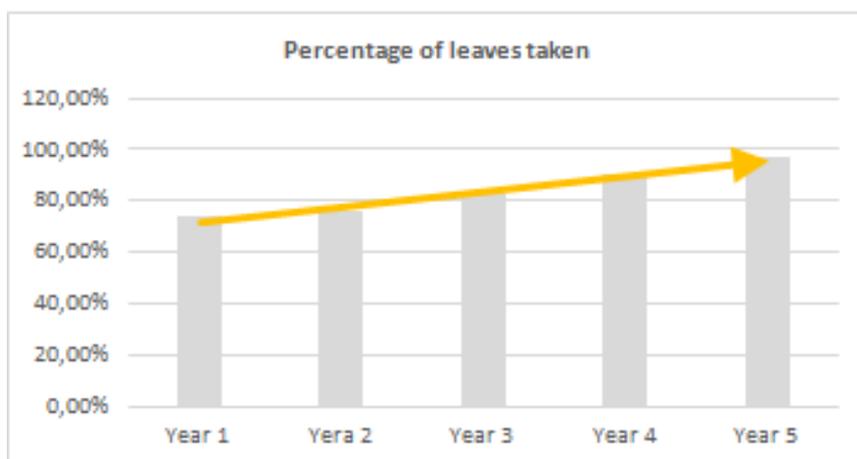
- Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation (e.g.: life insurance, health care, disability and invalidity coverage, parental leave, retirement provision, stock ownership) *(G4-LA2)*

Career Management: what can you report?

To monitor recruitment and lay-off procedures
- Number of week notice prior to the lay-off *(G4-LA4)*

To monitor training and education plans
- Average number of training hours per employee which is calculated with the following formula: Total number of training hours provided to employees / Total number of employees *(G4-LA9)*
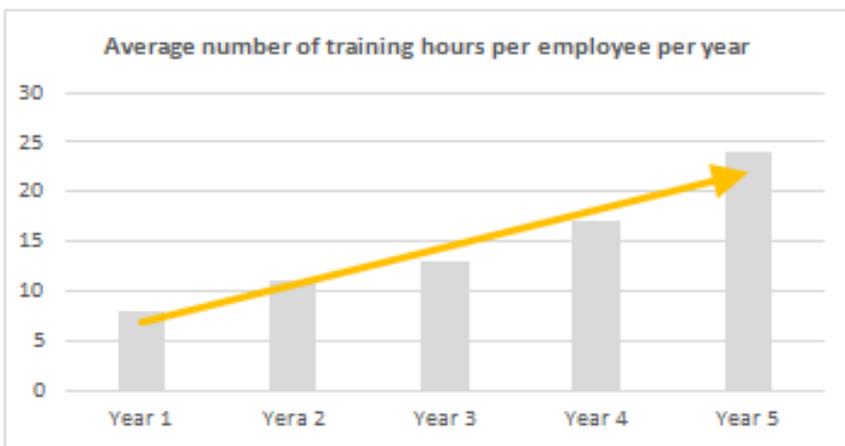
- Number of programs for skills management and lifelong learning *(G4-LA10)*

To monitor performance evaluations
- % of annual interviews performed *(G4-LA11)*

Social Dialogue: what can you report?

To monitor social dialogue measures
- % of employees covered by collective agreements
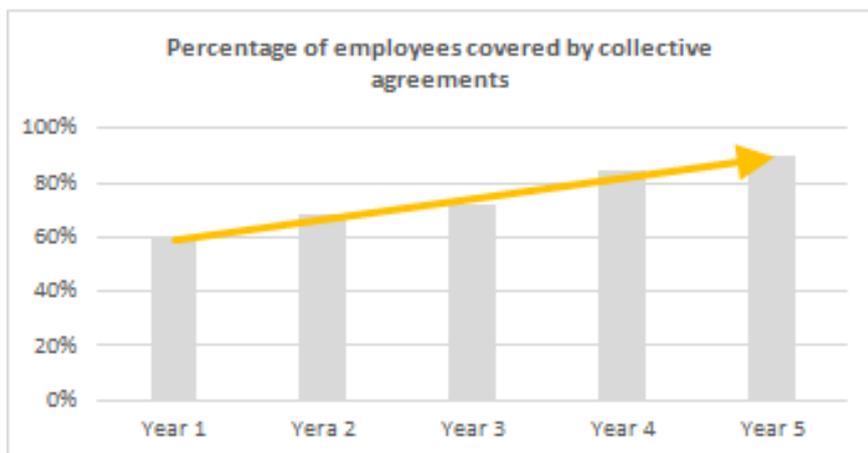
- Number of meetings of the committee
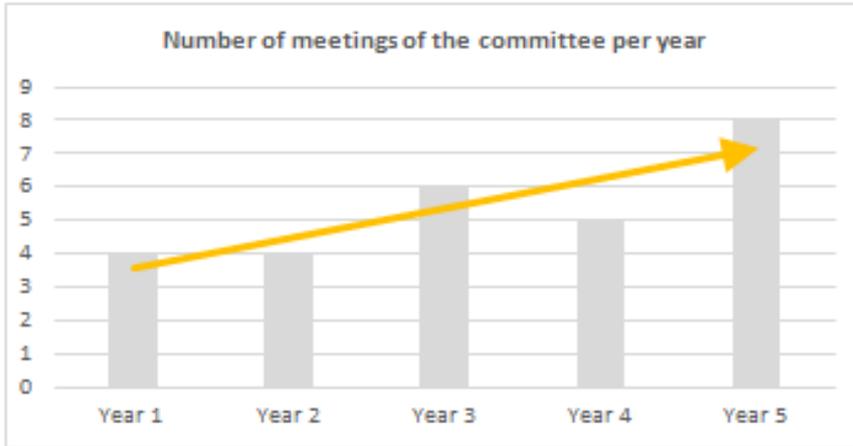
- Health and safety topics covered in formal agreements with trade unions *(G4-LA8)*

Human Rights: what can you report?

To monitor anti-discrimination programs
- Composition of governance bodies and breakdown employees per employee category *(G4-LA12)*
- Ratio of basic salary and remuneration of women to men by employee category *(G4-LA13)*
- Retention rates after parental leave, by gender *(G4-LA3)*
- % of employees trained on these topics

To monitor whistle-blowing systems
- Total number of incidents reported through the whistle blowing system *(G4-LA16 / G4-HR12)*
- Number of corrective actions taken *(G4-HR3)*
- % of cases reported resulting in sanctions
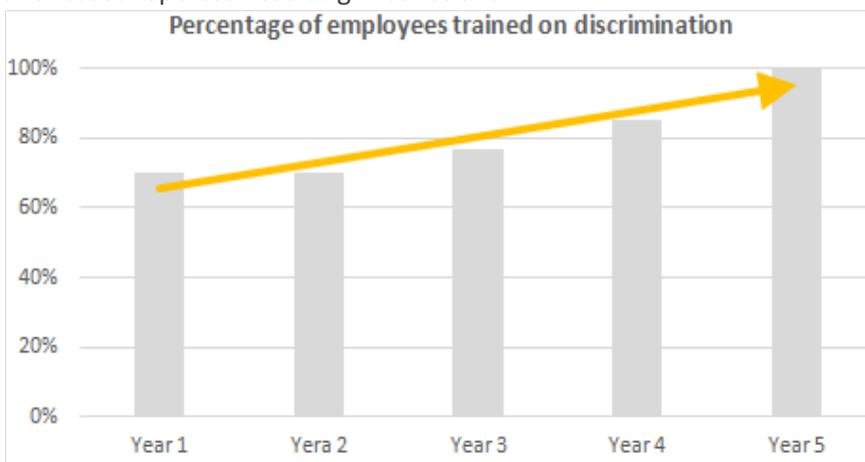
To monitor training plans
- Total number of training hours per employee
- % of attendance
- % of employee trained

ecovadis	**Improvement areas** ⚠️

SUSTAINABLE SUPPLY MANAGEMENT

- *Claims a policy on responsible marketing/business ethics but no supporting documentation*
- *No business ethics policies*
- *Basic ethics policy*

WHY A POLICY?
Set clear rules for employees
Provide an ethic framework

Reminder: Before drafting the policy, your company should identify the most relevant issues at stake according to its profile. Best practice: set quantitative targets.

What you can address in your Ethics/Fair Business Practices

Corruption & Bribery

All forms of corruption at work:

- ✓ **Extortion:** demanding a sum of money (or goods) with a threat of harm (physical or business) if demands are not met *(source: UK's Serious Fraud Office or SFO).*
- ✓ **Bribery:** giving or receiving something of value to influence a transaction *(source: Serious Fraud Office, UK).*
- ✓ **Conflict of interest:** where an employee has an economic or personal interest in a transaction *(source: SFO).*
- ✓ **Gifts and entertainment:** gifts and entertainment are defined to mean anything of monetary value, offered or received by clients, potential clients or any other business partners *(source: US Office of Government Ethics).*
- ✓ **Fraud:** abuse of position, or false representation, or prejudicing someone's rights for personal gain *(source: SFO).*
- ✓ **Money laundering:** a financial transaction scheme that aims to conceal the identity, source, and destination of illicitly-obtained money *(source: Financial Action Task Force or FATF).*

Anti-competitive practices

- ✓ **Bid-rigging***:* a scheme in which businesses collude so that a competing business can secure a contract for goods or services at a pre-determined price *(source: Australian Competition and Consumer Commission or ACCC).*
- ✓ **Price fixing, Limit pricing, Predatory pricing***:* an agreement among competitors that raises, lowers, or stabilizes prices or competitive terms *(source: US Federal Trade Commission or FTC).*
- ✓ **Dumping***:* the export by a country or company of a product at a price that is lower in the foreign market than the price charged in the domestic market *(source: FTC).*
- ✓ **Coercive monopoly***:* setting the prices and production policies independent of the market, with immunity from competition *(source: Organization for Economic Cooperation and Development or OECD, Investopedia).*
- ✓ **Product tying:** illegal arrangement where, in order to buy one product, the consumer must purchase another product that exists in a separate market *(source: FTC).*
- ✓ **Dividing territories:** agreements between competitors to split markets and not compete with each other *(source: money-zine.com).*

Data privacy

- ✓ *Consumer and data protection, privacy, truthfulness of marketing messages*
- ✓ **Intellectual property***:* refers to creations of the mind, such as inventions; literary and artistic works; designs; and symbols, names and images used in commerce *(source: World Intellectual Property Organization).*

Don't forget!

☐ **Dedicated responsibilities**	☐ **Scope of application**	☐ **Policy issue date**
☐ **Logo of the company**	☐ **Signature of the management**	

EXAMPLE OF A FAIR BUSINESS PRACTICES POLICY

The extract below was chosen because it gives a preview of what a policy looks like. It mainly covers the expected items: it contains the logo of the company, a message from the CEO and dedicated responsible, it mentions the scope of application and it addresses most ethical issues relevant to this company.

**Sparrows Group
BUSINESS ETHICS POLICY**
June 2014

First Draft: 13-Nov-13
Final Version: 01-Jun-14

sparrows

Contents

STATEMENT FROM THE BOARD

The Sparrows team has driven growth and success on the fundamental principles of expertise, integrity and brand which go hand in hand. In order for us to continue being the trusted choice by our customers, employees and suppliers, it is everyone's responsibility to act with honesty, fairness and in compliance with the law.

In order to ensure that we all know what is considered or not considered as ethical behaviour within our organisation and to ensure that we comply at all times with all applicable laws and policies, we have developed this Business Ethics Policy (the "Policy") to provide guidance. The board of directors of Sparrows Offshore Group Limited (the "Board") will not allow the integrity of Sparrows to be compromised and is therefore strongly committed to this Policy and expects a similar commitment from all of Sparrows Group Personnel.

We expect all Sparrows Group Personnel to read and abide by the standards of ethical business practice set out in this Policy and to challenge actions or behaviour inconsistent with it. We also expect all third parties including our contractors, suppliers and other service providers to adhere to the same standards.

Sparrows' reputation is very important and valuable and is the responsibility of everyone, so you should stop and think before doing anything which:

- Could be perceived as bringing you, your colleagues, Sparrows or associated companies into disrepute;
- Could be perceived as compromising you, your colleagues, Sparrows or associated companies; or
- Could be considered by our customers or the public as unethical, inappropriate or unacceptable.

If you believe that a violation of this Policy has occurred, or may occur, you **must** report this using one of the reporting options set out in this Policy. We commit not to allow any form of retaliation against the reporting of violations.

This Policy sets high standards for all Sparrows Group Personnel, regardless of their position in the company or geographic location. We also expect that if you are in a supervisory or management role, it is your duty to promote and monitor compliance with this Policy – you may be held accountable if your team members act in an unlawful or unethical way.

Ethical business conduct makes good business sense and that is why we must follow the principles of this Policy and those of our customers and comply with the laws of the countries in which we operate.

On behalf of the Board:

Chairman of the Ethics Committee
Andrew Glen

Chief Executive Officer
Stewart Mitchell

Satisfactory: it mentions the scope

Missing: dedicated responsibilities

Satisfactory: message from the CEO and dedicated officer

Satisfactory: it mentions anti-competitive issues and responsible marketing issues (relevant for this company)

Satisfactory: it mentions corruption and bribery issues relevant for this company

Satisfactory: it mentions data privacy

ANTICOMPETITIVE & CORRUPTION ACTIONS

ecoVadis | Improvement areas ⚠

- *No anti-competitive practices measures/No implementation measures in place regarding Corruption & Bribery*
- *Declares measures on corruption/anti-competitive issues but no supporting document*
- *No information on mechanisms in place regarding respect of intellectual property rights issues*

RISKS/OPPORTUNITIES
Reputation impacts
Avoid legal claims while strengthening clients' trust

If your company does not have training measures, it should at least raise awareness among sales representatives.

What are anti-competitive practices and corruption?

Anticompetitive practices refer to a wide range of business practices in which a firm or group of firms may engage in order to restrict inter-firm competition to maintain or increase their relative market position and profits without necessarily providing goods and services at a lower cost or of higher quality. It includes bid-rigging, price fixing, limit pricing, predatory pricing, dumping, coercive monopoly, dividing territories, intellectual property or product tying (*source: OECD).*

Corruption is the abuse of entrusted power for private gain, applying to both the public and private sectors and typically involving: all forms of corruption at work extortion, bribery, conflict of interest, fraud or money laundering (*source: Transparency International).*

You will find below three types of actions: preventive actions (make sure that risks do not occur); corrective actions (deal risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTIONS	CORRECTION	MONITORING
OBJECTIVE Raise awareness and train: define, explain, provide case studies	**OBJECTIVE** Report suspicious cases, deal with them, provide guidance to employees	**OBJECTIVE** Internal or external audits
WHY To prevent and avoid unfair business practices	**WHY** So that management can handle & solve the cases and employees know what to do	**WHY** To check if rules are applied, to detect policy violations
WHO To everyone. **At the very least**: risky populations: sales representatives, CFO contractors. Actors: trainers	**WHO** Should apply companywide to all employees Actors: legal department	**WHO** SA: companywide, risky countries especially Actors: internal compliance officers or external independent auditors
HOW 1)Signature acknowledgement of policy 2)On-line or on-site training 3)Formal partnership with external stakeholders	**HOW** 1)Whistle blowing 2)Secure communication channel for employees to seek advice3) Structure mechanisms to deal with violations 4)Disciplinary measures	**HOW** Documentary audits or on-site audits One-time or frequent audits

EXAMPLE OF WHISTLE-BLOWING PROCEDURE

This whistle-blowing procedure below covers most expected items: it mentions the scope of application and contacts, it defines the different stages of the procedure, and it reminds the rights of the whistle-blowers. The only missing element is the signature of the Chairman.

The whistle-blowing procedure has been chosen as an example because it is important for employees to know that they can report wrongdoings to their employer through a transparent and effective tool.

XXXX's Whistle-Blowing Procedure

This procedure applies to all employees, former employees and contract workers working with XXXX or its subsidiaries ('Workers').The purpose of this procedure is to provide a framework to promote responsible whistle-blowing. Whistle-blowing is the reporting by Workers of any malpractice or illegal act or omission by other Workers.

SCOPE OF APPLICATION → **Satisfactory: scope of application is mentioned**

The use of this procedure should be restricted to where you reasonably believe one of the following has occurred, is occurring or is likely to occur: a criminal offence, including fraud; disregard for legislation, particularly in relation to health and safety at work; malpractice, or ill treatment of a customer or supplier by a member of staff; serious damage to the environment; any other serious irregularity such as data theft or hacking; or deliberate concealment of any of the above.

Whistle-blowing should not be a route for raising malicious or unfounded allegations. Only those who use this policy in good faith will be protected under it.

TO WHOM NOTIFY THE CONCERN

The following persons are the Designated Officers under this procedure. They have direct access to the Chairman of XXXX: **R. B.** Email: xxxxxxxx@xxxxxxxx

H. M. Email: xxxxxxx@xxxxxxx → **Satisfactory: designated officers' contacts are given**

You can normally raise concerns about wrongdoing and malpractice with your immediate manager first, who will notify the matter to one of the Designated Officers.

If you consider it more appropriate to raise your concern, in the first instance, with a director of XXXX, other than the Designated Officers, then please do so and he or she will notify one of the Designated Officers.

If the matter is of a very serious nature, such as an allegation of fraud involving an XXXX director, or if it involves your immediate manager, you may notify one of the Designated Officers direct. You must include the words 'Whistle-blowing' in the subject heading of the email or letter you send.

THE INVESTIGATIVE STAGES

You may not make anonymous complaints to the Designated Officer, but your identity may remain confidential to the Designated Officer as far as reasonably practicable. Whether your statement will be written or oral, in either case the Designated Officer will write a brief summary of the interview, which will be agreed by both parties.

The Designated Officer will report to both the Head of the Compliance department or the Head of XXXX and the other Designated Officers, they will together decide on what further investigation, if any, should take place. They will report back to you within 10 working days of your interview or receipt of your complaint.

The investigation

The employee under investigation will not be informed until necessary. In certain other circumstances, the employee may have to be suspended pending the investigation. If the investigation shows there is a case to answer, the Company's Disciplinary Procedure will be invoked against the employee concerned. If there is found to be no case to answer, the Designated Officer will ensure that you are protected, provided the disclosure was made in good faith. Only where you are found to have made false allegations maliciously will the Disciplinary Procedure be invoked against you.

If the concern raised is very serious or complex, an inquiry may be held.

Following the investigation

The Designated Officer, possibly in conjunction with the Head, will arrange a meeting with you to give feedback on the investigation. The feedback will be provided within 10 working days of the conclusion of the investigation and any inquiry.

The law

This procedure is meant to complement any local legislation which protects Workers making good faith disclosures about certain matters of concern.

Protection of whistle-blowers → **Satisfactory: reminds the whistle-blower's rights**

XXXX will not tolerate any harassment, victimisation or discrimination of a good faith whistle-blower and will treat this as a serious disciplinary offence. The whistle-blower's rights against retaliation under any applicable legislation are fully recognised by XXXX.

Missing: the Chief Executive Officer's and designated officers' signatures

81

ecovadis | Improvement areas ⚠

- *No supporting documentation on implemented measures regarding data privacy*
- *No information on implementation measures regarding data privacy*

RISKS MANAGED PPORTUNITIES

Reputation impacts

Avoid legal claims while strengthening clients' trust

These actions are specifically important for Software firms.

What is data privacy?

What is data? Data means information which is being recorded, processed, and stored in your information system. Data protection aims to protect personal and corporate data. Personal data means the rights of individuals and employees whom the data is about, mainly by placing duties on those who decide how and why such data is processed, and by this way, protect the image of the company. Corporate data concerns basically information relating to the company or its clients and suppliers, like contacts, clients' files, documents from the research department, contracts, etc. (*source: Information Commissioner's Office, UK*). Consumer data protection and privacy are intended to safeguard consumers' rights of privacy by limiting the types of information gathered and the ways in which such information is obtained, used and secured (*source: EcoVadis*).

You will find below three types of actions: preventive/corrective actions (make sure that risks do not occur); correction (eliminate risks when they have occurred); monitoring (control that risks are managed).

PREVENTIVE ACTIONS

OBJECTIVE
Train and educate your staff on data security, privacy and protection

WHY
To prevent any data security breach

WHO
SA: everyone is concerned
Actors: IT teams and trainers

HOW
Organize e-learning courses or on-site training courses

CORRECTION

OBJECTIVE
Make sure that data is safe by ensuring that your IT systems and devices are secured

WHY
To prevent cyber-attacks and data losses, data leakage, or disclosure of misleading

WHO
SA: companywide, especially risky populations
Actors: IT teams

HOW
IT: control access rights, whistle blowing processes, install firewalls, install anti-virus programs, encrypt data, check USB safety

MONITORING

OBJECTIVE
Control that data protection measures are implemented

WHY
To control that data security is ensured; to obtain ISO/CEI 27000 certification

WHO
SA: companywide, especially risky populations
Actors: IT teams or internal/external auditors

HOW
Conduct one-off audits (external auditors) and permanent controls (internal controllers)

HOW CAN YOU TRAIN YOUR STAFF BY E-LEARNING COURSES

Training your company's staff is the best way to make sure data is protected and information systems are safe. Why? First, they are the first target of hackers; second, some employees have access to sensitive information. Therefore your firm needs to help its staff gain the right reflexes to avoid any form of security breach which could lead to information leakage or data theft. Here, we decided to specify the core elements of an e-learning on data security.

HOW TO CREATE AN E-LEARNING ON DATA SECURITY

Objective:
Help your employees gain daily reflexes on data security by raising awareness

What you should address:

- ☐ Explain first what is data security

- ☐ Develop the core elements of data security:

Risks of security breach, such as:
- Information leakage
- Identity theft
- Malware

Crisis management in case of security breach:
- How to ensure business continuity in such situations (for your information, your company shall draw up a business continuity plan that would be executed in case of major cyber attack or incident)

Consequences
- Law infringrement and relating sanctions

How to structure an e-learning on data security:

An e-learning on data security must last at least 15 minutes. The course must end with a quiz (5 to 20 questions) whose answers must be at leat 80% correct. Otherwise, your employees should take the course once again, until they get a score assessed "satisfactory" (80% of correct answers).

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SUSTAINABLE SUPPLY MANAGEMENT

| Improvement areas ⚠️

- *No performance reporting on business ethics issues (e.g. number of breaches of code of ethics, ...)*
- *No information on percentage of employees trained on business ethics issues (web-based or in person)*
- *Basic reporting on business ethics*
- *Declares reporting on business ethics but no documentation*

WHY monitor KPIs?

Monitor performance

Foster continuous improvement

Don't forget !

- ✓ **Format: graphs and tables with sources**
- ✓ **Only report on implemented actions**
- ✓ **Scope of application taken into account**
- ✓ **Format: graphs and tables with sources**

KPIs that you can monitor in your Ethics/Fair Business Practices Reporting:

According to your company activities, size or location, some criteria might be more relevant than others.

Corruption & Bribery & Anti-competitive practices: what can you report?

In general
- Number of breaches of the business ethics policy
- Number of unreported controls
- Confirmed legal incidents *(G4-SO5)*
- Total number and percentage of operations assessed for risks related to corruption and the significant risks identified *(G4-SO3)*
- Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes *(G4-SO7)*

To monitor business ethics training (G4-SO4)
- % of attendance

2011 ACHIEVEMENT
97% participation rate in Alcatel-Lucent anti-corruption training.

- % of risky population attendance

To monitor a whistle-blowing system
- Number of incidents reported through the whistle blowing procedure and repartition

Number of Hotline Calls
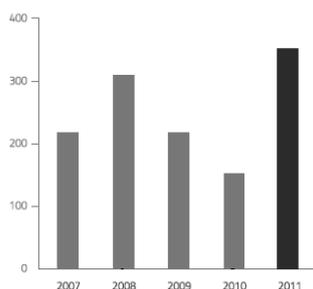
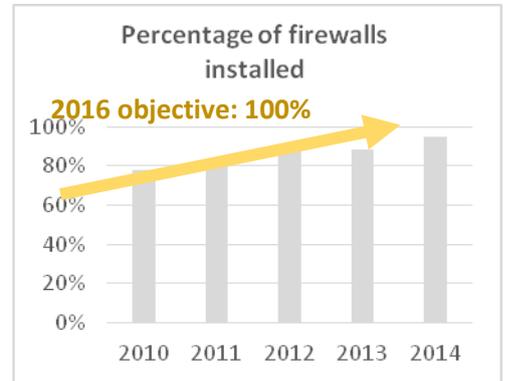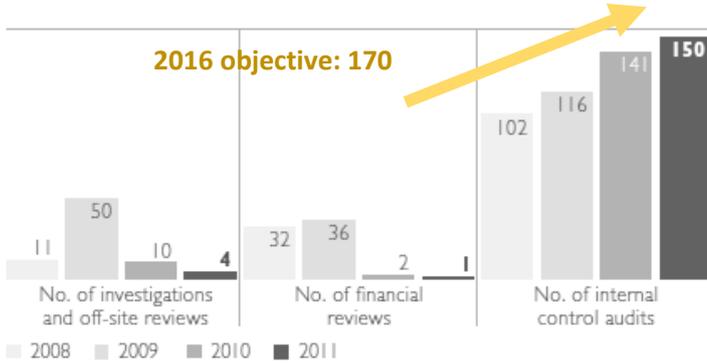Number of whistle-blowing concerns received
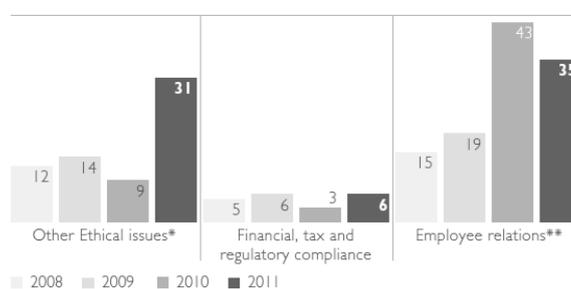
Data privacy: what can you report?
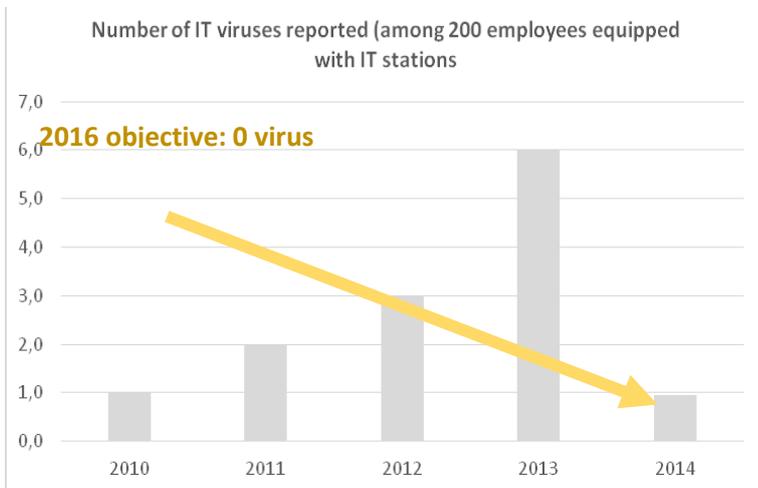
To secure data management
- Number of data security audits
- Number of leakages reported
- % of firewalls installed

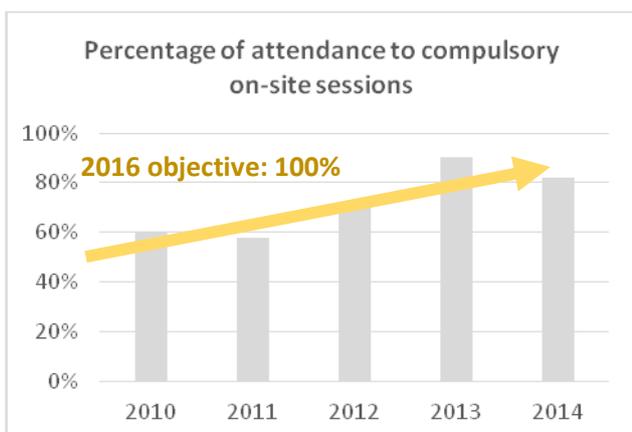Number of internal audits and reviews

2016 objective: 170

Percentage of firewalls installed

2016 objective: 100%

To secure IT systems and devices
- Number of reported IT viruses (specify number of IT stations)
- Average duration of inactivity due to an IT bug

Number of IT viruses reported (among 200 employees equipped with IT stations

2016 objective: 0 virus

To secure IT systems and devices

- % of attendance
- Number of audits

Percentage of attendance to compulsory on-site sessions

2016 objective: 100%

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SUSTAINABLE SUPPLY MANAGEMENT

| Improvement areas ⚠️

- *Claims sustainable procurement policies on environmental factors but no supporting documentation*
- *Claims X% of suppliers covered by sustainable/responsible procurement policy but no supporting documentation available*

WHY A POLICY?

Convey the company's standpoint on these topics

Strengthen business partners' trust and avoid legal risks

Reminder: Before drafting the policy, your company should identify the most relevant issues at stake according to its profile. Best practice: set quantitative goals.

What you can address in your Sustainable Procurement Policy:

AT SUPPLIER LEVEL

*Your company must **require your suppliers to have a socially responsible and eco-friendly management system**. The few examples of measures listed below do not constitute an exhaustive list; your suppliers may apply at least a few ones for each category.*

Environmental requirements

You may require your suppliers to implement measures to: reduce **energy Consumption & GHG;** reduce **water consumption** and manage water pollution**;** avoid or reduce the use of **hazardous chemicals, eco-design** products.

Social requirements

You may require your suppliers to implement measures related to labor practices and human rights: ensure employees **health and safety** (emergency preparedness, industrial hygiene…); secure **working conditions** (working hours & remuneration); ensure good **career management & training**; handle **discrimination issues**; structure **social dialogue**; or implement other measures related to **fundamental human rights**.

Check/ensure that requirements are met

In the policy, your company can specify how the requirements are going to be checked in order to make the policy company-specific.

For instance, your company can: ask them to **sign formal requirement**; **ask evidence** that measures are implemented during tenders or after (policies, management system certificates); send **questionnaires** or conduct **audits**; implement **training courses** to help your suppliers; or require **actions plans.**

AT PRODUCT LEVEL

Sustainable procurement also means buying products or services that generate positive social and environmental impacts. It does not mean donation, volunteering or any form of charity.

Environmental criteria

Buy **recyclable** products, **eco-labeled** products, **energy-efficient** products, **organic** product, etc.

Social criteria

Contract with **companies that employ people with disabilities**, individuals who have been through rehabilitation processes of any kind; buy **fair-trade** products, etc.

Don't forget!

☐ **Dedicated responsibilities** ☐ **Scope of application** ☐ **Policy issue date**

☐ **Logo of the company** ☐ **Signature of the management**

EXAMPLE OF A SUSTAINABLE PROCUREMENT POLICY

Sustainable Procurement is a complex area of Corporate Social Responsibility. Therefore we chose to take Alcatel Lucent's Sustainable Procurement Policy as an example, for clear understanding of which elements such a policy must contain. Moreover, you can see that ALU's Sustainable Procurement policy is correctly formalized. However, this policy only covers the requirements demanded at supplier level, not at product level.

Sustainable Purchasing Policy

Consistent with our Code of Conduct and Human Rights Policy, Alcatel-Lucent is fully committed to promoting Sustainability within its supplier base. Suppliers include any third party that provide Alcatel-Lucent with components, hardware, software, support, equipment and services, of all types, whether for our own internal consumption or for use in our products, services and solutions provided to our customers. Alcatel-Lucent shall carry out this commitment by:

Require: Communicate clear sustainability requirements to suppliers through contractual purchasing requirements and product or service specifications

- Establishing sustainability requirements based on the United Nations Global Compact principles, the Universal Declaration of Human Rights, the International Labor Organization's fundamental conventions and other international initiatives; and

  Satisfactory: it mentions CSR criteria

- Ensuring all contractual documents signed with suppliers include a supplier commitment to adhere to the Alcatel-Lucent suppliers code of conduct (*), the Global Compact principles and comply with environment, health and safety requirements, as applicable to the business of the supplier.

Assess: Evaluate suppliers' sustainability performance through ratings and onsite audits

Satisfactory: it specifies how requirements are going to be checked

- Assessing suppliers on their Sustainability practices' following our suppliers code of conduct requirements, consistent with our commitments toward our customers and market expectations in the applicable field.

Improve: Push and support the improvement efforts of suppliers whose performance is not at the expected level

- Integrating sustainability performance in the selection and management of suppliers;
- Requiring unsatisfactory suppliers to develop actions to improve their sustainability performance; and
- Working with suppliers by providing recommendations and advice on the proposed actions.

Satisfactory: it contains the scope of application

All Alcatel-Lucent employees who interface with suppliers are fully responsible for complying with this policy and for raising Sustainability awareness among our supplier base. This policy will be regularly reviewed, updated as necessary, and will be applicable and communicated to all impacted stakeholders.

Michel Combes
Chief Executive Officer

Satisfactory: signature of the CEO

(*) our suppliers code of conduct is based on the EICC code of conduct.

Alcatel·Lucent
1AA003100060ASZZA, Edition 6.0
8 April 2013

Satisfactory: it contains the logo and date

SUSTAINABLE PROCUREMENT ACTIONS

ecovadis | Improvement areas ⚠

- *No specific implementation measures in place regarding sustainable procurement.*
- *Claims audit, assessment or charter of suppliers on environmental or social issues but no supporting documentation provided.*
- *Claims X%*

RISKS MANAGED	OPPORTUNITIES
Manage reputational risk due to supply chain issues	Increase business and investments by addressing investors' and clients' expectations
Manage operational issues due to poor CSR management	Increase supply chain reliability

What is sustainable procurement?

Sustainable procurement addresses suppliers' and subcontractors' CSR impacts or the impacts of the products bought. Thus, there are two approaches within sustainable procurement : at supplier level and at product level.

First, companies having a supply chain can set environmental, social and ethics requirements towards their supplier's company, at corporate level. The second approach is at product level. All companies have internal use products, for which they can include social and environmental criteria. Please note that sustainable procurement is about buying, thus donations, volunteering or any form of charity are irrelevant here.

AT SUPPLIER LEVEL : SUPPLY CHAIN

These actions concern mainly companies with a supply chain, especially in risky countries.

You will find below three types of actions for sustainable procurement: require, assess and improve.

REQUIRE

OBJECTIVE
Define social and environmental requirements for suppliers

WHY
So that they align on the client's values and comply with international standards

WHO
SA: suppliers/subcontractors
Actors: purchasing organization

HOW
1) Definition of a supplier code of conduct 2) Make the code of conduct a contractual requirement: signature of code of conduct (contracts) inclusion of CSR criteria in tenders, in purchasing terms and conditions 4) Define KPI and monitor them

ASSESS

OBJECTIVE
Evaluate suppliers' sustainability performance

WHY
Check that requirements are met

WHO
SA: suppliers/subcontractors
Actors: purchasing organization

HOW
1) Assess suppliers' CSR risks 2) Assess suppliers' management systems 3) Implement on-site audits 4) Launch management program with monitoring of performance (KPIs, etc.)

IMPROVE

OBJECTIVE
Help suppliers to reach better CSR performance

WHY
Have the suppliers meet the defined requirements

WHO
SA: suppliers/subcontractors
Actors: purchasing

HOW
1) Implement training programs and raise awareness (workshop, seminars) 2) Launch and follow-up improvement plans so that suppliers address identified improvement areas 3) Provide them with supporting documentation on CSR 4) Set up business incentives for these who meet the requirements

AT PRODUCT LEVEL: INTERNAL USE PURCHASE

All organizations are concerned by the actions below, as all of them have internal use purchases.

You will find below "Planning Phase" actions that a company can implement in order to create a positive framework to develop such purchases. During "Acquisition Phase", there are 2 categories of criteria to include in sustainable procurement: environmental and social.

PLANNING PHASE

OBJECTIVE
Define sustainability criteria for purchased products and set up framework for implementation

WHY
To integrate CSR into purchasing processes

WHO
Purchasing organization and internal clients

HOW
1) Develop product-specific requirements following the objectives defined in the policy 2) Define processes to integrate total cost of ownership into purchasing selection 3) Integrate criteria into tenders, as mandatory or part of assessment 4) Define associated requirements/incentives for buyers 5) Monitor related KPIs

ACQUISITION

ENVIRONMENTAL

WHAT
Purchase products with reduced environmental impacts

WHY
Mitigate environmental impacts and make money savings

WHO
Purchasing organization and internal clients

HOW
1) Purchase: Eco-labeled products (Ecologo, Energy Star, EPEAT); or products that consume less energy, utilize renewable energy; Organic products; Certified recycled paper; Local produced products; Less packaging material products 2) Consider other factors indirectly related to the purchase, which should also be eco-friendly, including: delivery, disposal, maintenance, etc.

SOCIAL CRITERIA

WHAT
Purchase products that have positive social impacts

WHY
Manage social impacts, develop new partnerships, participate in local economy and empower people

HOW
Purchase: Fair-trade products; Resort to companies employing disabled people or disadvantaged communities and/or enhancing diversity

89

SUSTAINABLE PROCUREMENT ACTIONS

EXAMPLE OF AUDIT CHECKLIST

The following checklist includes criteria that can be checked by QSE managers in factories or for installation services. The following criteria are often used to identify major CSR issues.

1. *Has the supplier/subcontractor drawn a health and safety prevention plan?*
2. *Have the workers been trained on health and safety hazards and do they use Personal Protective Equipment?*
3. *Is there an emergency procedure in case of accident? Are there regular fire drill exercises?*
4. *Are hazardous substances properly locked? Are there MSDS available?*
5. *Are there workers below 15 years-old? (Check identity papers)*
6. *Do interviews of employees report excessive overtime? (<60 hours)*
7. *Are there deductions from wages as disciplinary measures?*

EXAMPLE OF CORRECTIVE ACTION PLAN

A Corrective Action Plan enables your company to help suppliers manage their CSR risks. This example shows that improvement areas are identified, solutions are suggested, and then advice are tailored according to suppliers' comments. Other improvement areas can be addressed. Here it lacks formalization: date, owner, logo...

DOMAIN	Non-conformity/Improvement area	Recommendations	Comment from supplier	Comment from client	…
Environment	No measure to sort out waste	Draw a procedure to sort out waste including : type of waste, responsible, frequency	Procedure has been completed and is available for review	The procedure is positive as it specifies type of waste, responsible, frequency.	…
Labor practices	No prevention plan	Draw a prevention plan : type of risks, classification, solution to be implemented	Prevention plan will be made next month with safety experts	I'll wait for your document	
Ethics	No rules for gifts and invitations	Draw a procedure and communicate it to employees. Classify authorized gifts to be received and given, indicate prices each time, and specify who should approve gifts.	We have only one salesman as we're a small company. Instead, we specify in an email that all gifts should be approved by our CEO. Our external accountant agency will check if corruption has been made.	It seems relevant and it helps you manage this CSR risk, by adapting it to your company. I will need to see this email please.	
….	…	…	…	…	…
…..	…	…	…	…	…

Satisfactory: documents need to be shown as evidence

Satisfactory: categories are specified

Satisfactory: recommendations are made

Satisfactory: solutions are tailored according to the company's specificities. What matters: manage the CSR risk.

Missing: formalization. Deadlines help follow-up the project, as well as owners of comments, as well as logos to identify the companies, and information can be specified: result from audit, result per category, among others.

- Significant actual and potential negative environmental impacts in the supply chain and actions taken *(G4-EN33)*:
  - o Report the number of suppliers subject to environmental impact assessments
  - o Report the number of suppliers identified as having significant actual and potential negative environmental impacts
  - o Report the significant actual and potential negative environmental impacts identified in the supply chain
  - o Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment
  - o Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why

Number of significant actual or potential negative environmental impacts identified in the supply chain
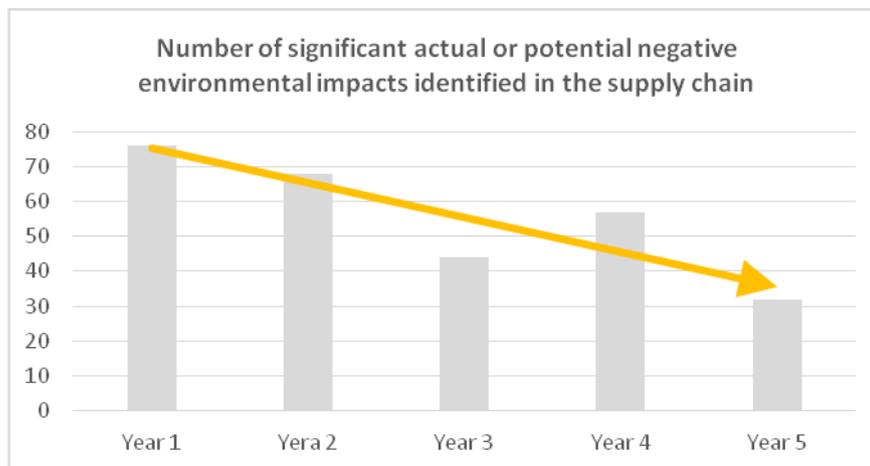
To assess the inclusion of labor practices criteria in the supply chain

- % of new suppliers that were screened using labor practices criteria *(G4-LA14)*
- Significant actual and potential negative impacts for labor practices in the supply chain and actions taken *(G4-LA15)*:
  - o Report the number of suppliers subject to impact assessments for labor practices
  - o Report the number of suppliers identified as having significant actual and potential negative impacts for labor practices
  - o Report the significant actual and potential negative impacts for labor practices identified in the supply chain
  - o Report the percentage of suppliers identified as having significant actual and potential negative impacts for labor practices with which improvements were agreed upon as a result of assessment
  - o Report the percentage of suppliers identified as having significant actual and potential negative impacts for labor practices with which relationships were terminated as a result of assessment, and why

### *Focus on human rights:*

- Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights *(G4-HR4)*
- Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor

To assess the inclusion of ethics criteria in the supply chain
- Percentage of new suppliers that were screened using criteria for impacts on society *(G4-SO9)*
- Significant actual and potential negative impacts on society in the supply chain and actions *taken (G4-SO10)*:
    o Report the number of suppliers subject to assessments for impacts on society
    o Report the number of suppliers identified as having significant actual and potential negative impacts on society
    o Report the significant actual and potential negative impacts on society identified in the supply chain
    o Report the percentage of suppliers identified as having significant actual and potential negative impacts on society with which improvements were agreed upon as a result of assessment
    o Report the percentage of suppliers identified as having significant actual and potential negative impacts on society with which relationships were terminated as a result of assessment, and why

At product level: what can you report?

To monitor the resort to environmental and social products
- % of ecolabeled, social, fair trade products within the purchasing category

Percentage of ecolabeled, social, fair trade products within the purchasing category

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SUSTAINABLE SUPPLY MANAGEMENT
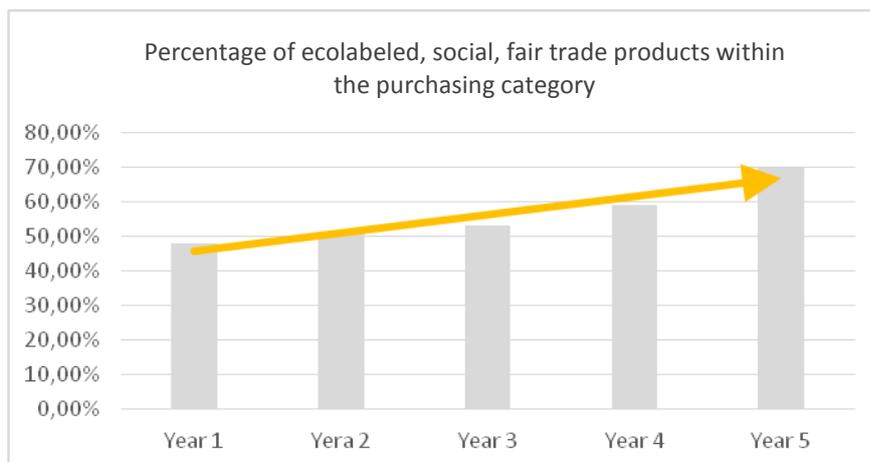
| Improvement areas ⚠

- *No conflict minerals policy*
- *Claims a policy on conflict minerals but no supporting documentation*
- *No measures on conflict minerals management*
- *Declares reporting on conflict minerals but no supporting documentation available*

WHY ADDRESS CONFLICT MINERALS?
Comply with legal regulations
Facilitate client's work

Reminder: This section only suits for companies which are under the Security and Exchange Commission (SEC) Rules

What you can address in your Conflict Minerals Policy:

Overview

✓ **Conflict Minerals:** explain why the extraction and trade of tin, tantalum, tungsten and gold originating from the DRC and covered countries bring conflict

✓ **Your impact:** explain your activity and the high probability of use of conflict minerals in the products you manufacture and/or contract to manufacture

Your company's commitments on conflict minerals

✓ **Acceptance of the existence of the issue:** recognizing your role in the protection of the Human Rights and the environmental in these regions

✓ **Implementation of due diligence practices:** determine the origin of the minerals used in your supply chain and request the elimination of the use of conflict minerals from your suppliers

✓ **Recognizing the complexity of the upstream supply chain:** define SMART (Specific, Measurable, Achievable, Results-focused, Time-bounded) objectives

Your actions

✓ **Getting involved** in an initiative such as the Conflict-Free Sourcing Initiative (CFSI)

✓ **Setting yearly objectives:** enlarging your assessment scope, being conflict-free on specific products/minerals, requesting product-level information from your suppliers, setting your own requests from your suppliers, etc.

✓ **Rolling out the due diligence program:** collecting conflict minerals data from your suppliers, asking for improvements for unsatisfactory data

✓ **Determining the status of your products:** reasonable country of origin (RCOI) to determine where your products come from and if they come from the DRC, determining if they are free of any conflict or no

✓ **Reporting** on you conflict minerals due diligence program (if requested by the SEC): file the Form SD and the Conflict Minerals report

CONFLICT MINERALS

CONFLICT MINERALS MANAGEMENT ACTIONS

You will find below three types of actions: preventive actions (make sure that the risks do not occur); corrective actions (deal the risks when they have occurred); monitoring (control that the risks are managed).

PREVENTIVE ACTIONS

OBJECTIVE
Raise awareness, define, explain, and provide case studies

WHY
To prevent and avoid sourcing from conflict-affected regions

WHO
SA: suppliers and buyers
Actors: management, purchasing

HOW
On-line or on-site training sessions

CORRECTIVE ACTIONS

OBJECTIVE
Report the issues on templates and ask for improvements

WHY
To obtain the most accurate information

WHO
SA: suppliers involved
Actors: conflict minerals manager, buyers

HOW
Frequent direct communication with the supplier

MONITORING

WHAT
Internal and/or external audits

WHY
To check if the engagements are actually being applied, to detect policy violations

WHO
SA: suppliers involved
Actors: conflict minerals manager, buyers

HOW
Documentary or on-site audits, one-time or frequent audits + monitoring of KPIs

KPIs that you can monitor to manage conflict minerals:

In general

✓ **Number of assessed suppliers** : number of suppliers targeted for the conflict minerals data collection

✓ **Percentage of spend covered in the report**: percentage of spend covered by the targeted suppliers

To monitor trainings

✓ **Percentage of trained suppliers**: training sessions for the completion of the template and for data collection

✓ **Percentage of "risky" suppliers**: unsatisfactory data from the previous year's report

✓ **Percentage of trained commodity managers**: percentage of commodity managers sensitized on the topic

To monitor conflict minerals data/information

✓ **Percentage of conflict-free suppliers**: suppliers sourcing from "safe" regions

✓ **Percentage of conflict-free smelters:** smelters sourcing from "safe" regions

✓ **Results of the RCOI:** Percentage of smelters coming from the Democratic Republic of the Congo and adjoining countries

✓ **Percentage of conflict-affected suppliers:** suppliers sourcing from high-risk areas (if applicable)

Management systems are also about governance.

What is organizational governance? "Organizational governance is the system by which **an organization makes and implements decisions in pursuit of its objectives.** Organizational governance can comprise both **formal governance mechanisms** based on defined structures and processes and **informal mechanisms** that emerge in connection with the organization's culture and values, often influenced by the persons who are leading the organization" (*source: ISO 26 000*).

Principles:

Effective governance should be based on incorporating the **principles of social responsibility** into decision making and implementation. These principles are **accountability, transparency, ethical behavior, respect for stakeholder interests, and respect for the rule of law, respect for international norms of behavior and respect for human rights**. In addition to these principles, an organization should consider the practices, the core subjects and the issues of social responsibility when it establishes and reviews its governance system. **Leadership** is also critical to effective organizational governance. This is true not only for decision making but also for employee motivation to practice social responsibility and to integrate social responsibility into organizational culture. **Due diligence** can be a useful approach for an organization in addressing the issues of social responsibility.
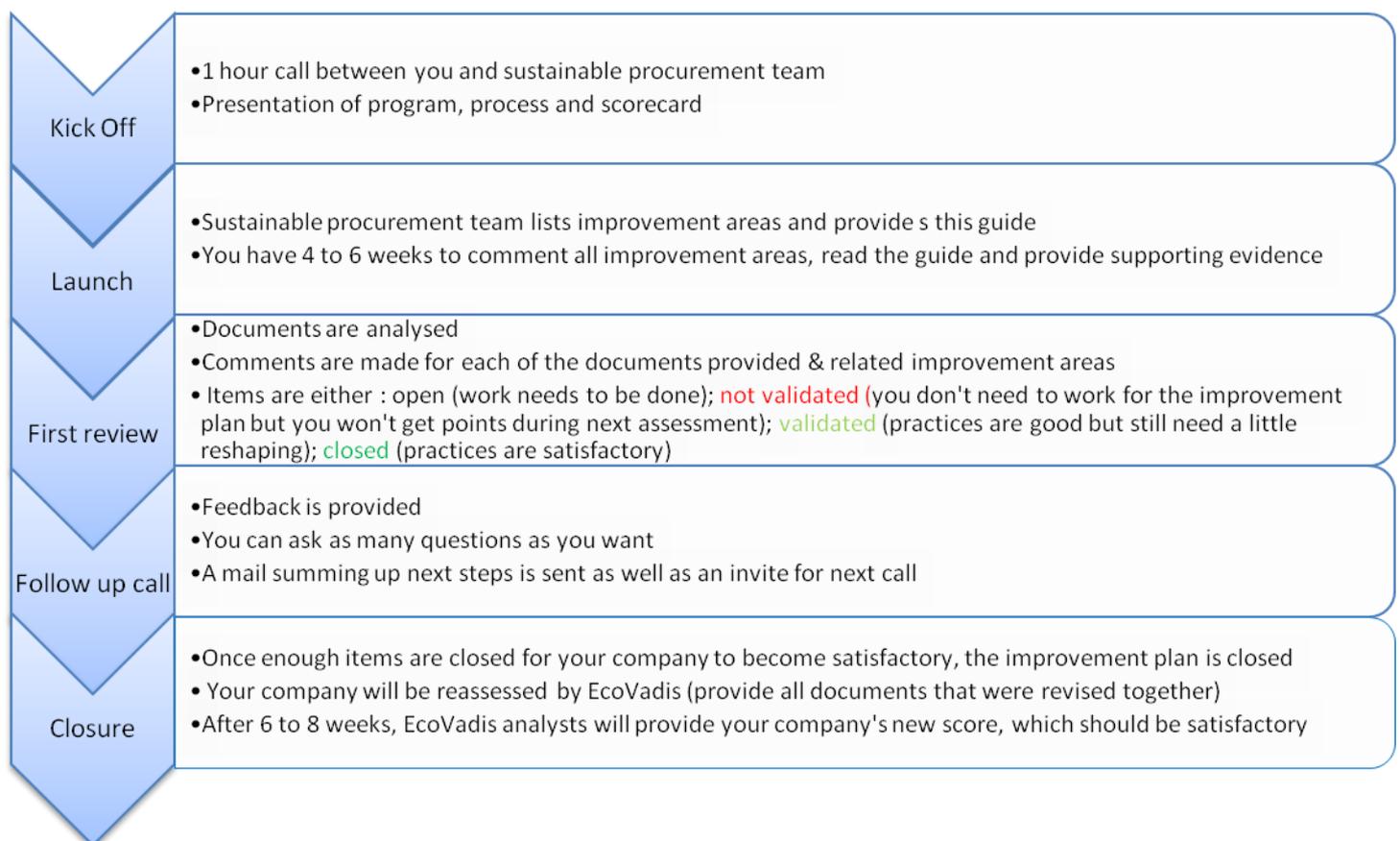
ISO 26 000 Guidelines regarding governance:

- "Develop strategies, objectives, and targets that reflect its commitment to social responsibility; demonstrate leadership commitment and accountability;
- create and nurture an environment and culture in which the principles of social responsibility are practiced create a system of economic and non-economic incentives related to performance on social responsibility
- use financial, natural and human resources efficiently
- promote a fair opportunity for underrepresented groups (including women and racial and ethnic groups) to occupy senior positions in the organization
- balance the needs of the organization and its stakeholders, including immediate needs and those of future generations
- establish two-way communication processes with its stakeholders, identifying areas of agreement and disagreement and negotiating to resolve possible conflicts
- encourage effective participation of all levels of employees in the organization's social responsibility activities;
- balance the level of authority, responsibility and capacity of people who make decisions on behalf of the organization;
- keep track of the implementation of decisions to ensure that these decisions are followed in a socially responsible way and to determine accountability for the results of the organization's decisions and activities, either positive or negative;
- periodically review and evaluate the governance processes of the organization; adjust processes according to the outcome of the reviews and communicate changes throughout the organization." (source : http://www.cnis.gov.cn/wzgg/201405/P020140512224950899020.pdf)

Concrete best practices:

- Have a management representing the company's diversity
- Have members of the board accountable for CSR
- Be transparent on remuneration rules and index it on long-term objectives
- Have internal or external audits and controls
- Have an independent board

Nokia's sustainable procurement program

Why a **sustainable procurement** program?

- Request from our **clients and investors** to manage CSR risks in supply chain
- Sustainability is considered as a "**competitive advantage**"

The program in three words

REQUIRE/ASSESS/IMPROVE

- *Require:* contractual requirements to commit to CSR standards (EICC Code of Conduct, Global Compact)
- *Assess:* check that requirements are complied with, through management system assessments (EcoVadis) and on-site audits.
- *Improve:* help suppliers become satisfactory regarding CSR through the completion of an improvement plan

Advantages for suppliers

- You address a **client's request**
- You manage **CSR risks** (legal, operational, human capital, reputational risks) and benefit from **opportunities**

Kick Off
- 1 hour call between you and sustainable procurement team
- Presentation of program, process and scorecard

Launch
- Sustainable procurement team lists improvement areas and provide s this guide
- You have 4 to 6 weeks to comment all improvement areas, read the guide and provide supporting evidence

First review
- Documents are analysed
- Comments are made for each of the documents provided & related improvement areas
- Items are either : open (work needs to be done); not validated (you don't need to work for the improvement plan but you won't get points during next assessment); validated (practices are good but still need a little reshaping); closed (practices are satisfactory)

Follow up call
- Feedback is provided
- You can ask as many questions as you want
- A mail summing up next steps is sent as well as an invite for next call

Closure
- Once enough items are closed for your company to become satisfactory, the improvement plan is closed
- Your company will be reassessed by EcoVadis (provide all documents that were revised together)
- After 6 to 8 weeks, EcoVadis analysts will provide your company's new score, which should be satisfactory

To implement corrective actions:

- **Gather experts:** environment managers, HR representatives, buyers, legal department among others
- Get support from your own **management**
- **Read this guide** for examples and explanations on how to proceed
- Rely on the **sustainable procurement team**

CSR Implementation User Guide

This guide was released in June 2015 by former Alcatel-Lucent (now Nokia) Sustainable procurement team.

It aims at helping suppliers' companies implement CSR management systems. Thus it is composed of improvement area datasheets for policies, actions and reporting for each of the following domain: Environment, Labor Practices, Fair Business Practices and Sustainable Procurement.

It is easy to use : links enable you to easily come and go in the CSR user guide and the overview on management systems and CSR is translated into French, Spanish and Chinese and glossaries help understand the main themes of improvement area datasheets.

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