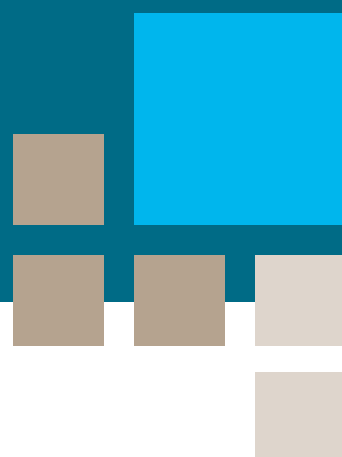


# Engagement Report

2015





In 2016, the PRI (Principles for Responsible Investment) will celebrate their 10th anniversary and Amundi is proud to count among the first signatories, the year the PRI were launched. In line with the commitments we made at the time, we have significantly expanded the consideration given to environmental, social and governance (ESG) criteria in our analysis processes and investment decisions in recent years. Amundi currently ranks among the world leaders in terms of assets under SRI management, with nearly 160 billion euros managed according to responsible investment principles. We have also created an ESG analysis desk in Tokyo to meet the Japanese market's growing ambitions in terms of SRI.

This SRI approach is based on the coverage of more than 4,000 companies, with the support of an in-house team of 16 analysts based in Paris and Tokyo and seven ESG rating and analysis agencies, as well as an engagement policy that aims to help companies take account of sustainable development criteria in their development. We meet more than 300 companies each year and vote at more than 2,000 general meetings. As a guarantee of the quality of our process, we are the first French Asset Manager to have had our SRI approach certified by an independent body, AFNOR. The rigour of our analysis and the performance indicators that we have implemented to monitor companies' progress are now recognised around the world. Amundi ranks first in the category "Asset Management firms best for SRI/ESG" in the 2015 "SRI & Sustainability" study published by WeConvene Extel and the UK Sustainable Investment and Finance Association (UKSIF).

In this context, our third engagement report provides us with an opportunity to take stock of the progress made by companies in respect of analysis criteria for the topics that we decided to address in 2013:

- Respect for human rights in the mining and oil sectors;
- Access to food and the fight against food waste in the food and retail sectors.

As a result of the robust KPI on which we have worked and to the close relationships that we have forged with companies and their stakeholders, we were able to highlight specific trends, indicating the progress made but also the work that lies ahead, as the topics we are dealing with are highly sensitive and complex. We therefore intend to continue engaging with companies on these issues while introducing new themes in 2016, especially the issue of greenhouse gas emissions in electricity companies.

The success of the COP 21 and the implementation of article 173 of the French law of 17 August 2015 on energy transition for green growth, which extends to institutional investors and management companies the obligation to publish information on how they take account of ESG criteria in their investment policy, with a strong focus on climate, strengthen our resolve to disseminate, as widely as possible, the consideration of ESG criteria in investment management processes and to show greater transparency in this respect.

**Pascal Blanqué**

**Global Head of Institutional Division & Chief Investment Officer**



# ENGAGEMENT REPORT

## AMUNDI – 2015

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# INTRODUCTION

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The historic agreement reached by the 196 Parties (195 States plus the European Union) present at the 21st Conference of the Parties (COP 21) held in Paris from 30 November to 11 December 2015 is without doubt the ESG highlight of 2015. The international community has committed to press on with its efforts to limit the global temperature rise to 2°C or even 1.5°C. Barring a few grey areas, notably regarding the possible pricing of carbon, COP 21 was a real success.

The global issue of climate change, however, should not obscure other ESG issues faced by the world. 2015 saw major environmental and social controversies, reflecting all the difficulty for companies and states of combining sustainable development issues with financial performance. In this regard, the oil extraction and mining sector, with which we initiated our engagement policy in 2013, is probably the most emblematic in a context where the legislative momentum is gathering pace and rigour.

First, at the international level, since June 2014 and at the request of the United Nations Human Rights Council, an intergovernmental working group has been drafting a legally binding international treaty on human rights and transnational corporations. At European Union level, Member States are encouraged to set up “a national plan of implementation of the UN Guiding Principles on Business and Human Rights”. The United Kingdom, the Netherlands, Italy, Spain, Finland, Sweden and Denmark have already published a plan, while France and Germany are currently drafting theirs. At French level, finally, the draft law on the duty of vigilance of contracting parent companies and businesses is under discussion at the Senate, after having passed the first reading by the National Assembly in the spring of 2015. Should this law be adopted, the parent companies and companies established in France that are placing the orders could be recognised as liable, in both civil and criminal terms, for the actions of

their subsidiaries and subcontractors abroad, unless they provide evidence that they have implemented the necessary measures to prevent potential damage to health, the environment or any violation of fundamental rights. This underscores the importance of the dialogue that we have established with companies on this subject since 2013, and the importance of monitoring the progress made by the companies we present in this report.

Regarding the second theme, nutrition and the fight against food waste, that we started addressing in 2013, the regulatory environment has also toughened. In December 2015, the French draft law concerning the fight against food waste passed the first reading by the National Assembly and is currently being read a second time. France is therefore poised to catch up with other European countries, notably Belgium where many cities have forced food industries to donate their surpluses to food redistribution charities. Furthermore, MEPs adopted a resolution in July 2015 aimed at reducing waste production by recommending that Member States create conventions allowing supermarkets to distribute their unsold goods to associations. While this theme obviously raises social issues, notably in terms of public health, it also raises environmental questions: one third of the edible proportion of produce intended for human consumption is lost or wasted, for a total estimated cost of \$1,000 billion and 3.3Gt of greenhouse gas annually, according to the Food and Agriculture Organisation of the United Nations (FAO).

Finally, new scandals have once again demonstrated the importance of governance. This unfortunately confirms the relevance of the engagement we made more than ten years ago, namely to exercise our voting rights in an informed and vigilant manner to protect our clients' interests and contribute to improve the practices of the companies we invest in. Amundi's systematic shareholder dialogue with the issuers in which it holds the largest positions is

continuing to evolve, going deeper into pertinent issues, extending to new ones or gradually opening up to direct contacts with Boards of Directors. The long-term relationship, built on trust, that we seek to establish must be beneficial to all parties. We are therefore particularly honoured to have taken the top three places in the Independent Research in Responsible Investment (IRRI) survey for the second straight year, thanks to the votes of the companies with whom we dialogue. The IRRI survey rewards the analysts with the best grasp of the challenges and opportunities facing companies.

The 2015 report presents:

- An **exhaustive** analysis of changes in the performance of companies with whom we have been exchanging since 2013 on the two following themes:
  - Respect for human rights in the mining and oil sectors
  - Access to food and the fight against food waste in the food and retail sectors.
- An interim **evaluation of a panel** of companies analysed in 2014 on the two following themes:
  - The responsible exercise of influence practices
  - The responsible & compliant sourcing of minerals from conflict zones.
- A focus on the most controversial companies, excluded from Amundi's active management funds
- A focus on Amundi's involvement in collective initiatives grouping together investors so as to influence a company or a panel of companies on targeted themes such as human rights, climate change, water, health, deforestation, etc.
- The main statistics related to meetings with companies for rating purposes.

# ENGAGEMENT :

## Overview of our philosophy and process

### PHILOSOPHY

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**Our investment strategies are based on several principles:** promoting respect for international conventions on human rights, the International Labor Organization (ILO) and the environment, as well as advocating a model for responsible and sustainable social development.

**The first application of these principles consisted in excluding from our investment strategies companies and countries with unacceptable behaviors:**

- Companies that violate these conventions repeatedly, without implementing suitable corrective measures.
- Companies involved in the production or sale of anti-personnel mines and cluster bombs (exclusions resulting from France's ratification of the Ottawa and Oslo treaties) as well as chemical, biological and depleted uranium weapons.
- Countries that systematically and willfully violate human rights and make themselves guilty of the worst crimes: war crimes and crimes against humanity.

**However, excluding stocks from funds must remain an exception. It is often an inadequate response.** We have noticed two things:

- Companies change their environment lastingly and sometimes have to deal with contradictory interests. In these circumstances, they can face more or less serious controversy. Exclusion must therefore be applied only in extreme cases.
- No longer being a shareholder means losing influence on the company.

**We prefer to focus on dialogue with companies through an engagement process.**

This engagement process comes within the broader scope of integrating ESG criteria in Amundi's investment management. Details on this policy are provided in the document: "*Intégration ESG - Gouvernance, Politique et Stratégie*". Finally, a *charter describing the principles of dialogue on ESG* issues was sent to a broad base of issuers. <http://about.amundi.com/Navigation/A-committed-player/Developing-responsible-finance>



## DETAILED ENGAGEMENT PROCESS

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### ENGAGEMENT WITH COMPANIES TAKES THREE FORMS

#### 1. Engagement for influence

This consists in meetings with companies intended to influence their practices. Recommendations made at company meetings concern cross-cutting themes common to a company's business sector. They highlight best practices and measure companies' progress based on a grid of success indicators set up by the extra-financial analyst.

#### 2. Data collection for rating purposes

Within this scope, company meetings are aimed at fine-tuning their ESG rating.

With the support of eight suppliers of extra-financial data, Amundi awards Environmental, Social and Governance (ESG) ratings to more than 4,000 issuers. The 2015 report presents the key statistics relating to meetings with companies for rating purposes.

#### 3. Voting at general shareholders' meetings and pre-meeting dialogue

- **Voting:** The corporate governance team systematically votes at the general meetings of French companies or of companies in which Amundi holds more than 0.05% of the capital, i.e. more than 2,500 general meetings a year.
- **Pre-meeting dialogue:** Amundi has implemented a formalised dialogue system to inform the companies in which it holds its largest positions of its voting intentions, to initiate a dialogue and contribute to the improvement of their practices. As well as this proactive approach, Amundi is open to all meetings requested by issuers to discuss general meeting or, more generally, governance themes. This second element is tending to increase in importance as it enables upstream and more constructive dialogue.

# RESULTS OF ENGAGEMENT POLICY IN 2015

## ENGAGEMENT FOR INFLUENCE






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Driven by our constant determination to encourage companies to adopt a progressive approach, our engagement for influence once again revolved around two complementary lines of work this year:

- Full review of the practices of the companies met in 2013, in order to assess their progress and identify major changes in their practices
  - Respect for human rights in the mining and oil sectors.
  - Access to food and the fight against food waste in the food and retail sectors.
- Monitoring of themes initiated in 2014.
  - The compliance of minerals from conflict zones in the electronics sector
  - Responsible lobbying by pharmaceutical companies and the automotive industry

## Methodology rating

In order to enable the companies analysed to know where they stand, we assessed the positioning of each one in relation to best practices.

For the sake of clarity, we opted for a three-tier assessment: ,  and  ( representing the best practices) reflecting how the company's approach matches up to best sector practices. In order to highlight the corrective actions to be implemented in priority, an assessment different from  may, in certain cases, not give rise to a recommendation for 2016, but will be kept under review.

In addition, changes in practices and the status of recommendations are also represented graphically:

- Change in practices
  - ▶ **Positive momentum:** significant improvement in corporate practices
  - ▶ **Neutral momentum:** little or no significant change
  - ▶ **Negative momentum:** regression in corporate practices
- Status of recommendations:
  - All the recommendations have been followed
  - ◐ Partially followed recommendations and/or being introduced
  - One or more recommendations have not been followed
  - No recommendations issued in 2013

Of the 42 companies met, 29 agreed to be specifically mentioned.

THEMES INITIATED IN 2013: ANALYSIS OF CHANGES  
IN CORPORATE PRACTICES

Themes initiated in 2013: Analysis of changes in corporate practices

Reminder of the theme

For the oil and mining sectors, we decided to focus our engagement on the integration of human rights issues. The societal pillar is fundamental and companies typically lag on the human rights aspect, which is one of the most difficult component to apprehend as it is difficult to quantify. In many respects, this is a key issue for sector players who must protect themselves from operational and reputation risks.

Human rights are a cross-cutting theme, related to all essential CSR themes. Since 2011, when the UN Guiding Principles were adopted, companies have made significant efforts concerning this theme. A new momentum has been set and even if processes are still in a construction phase on the whole, we felt it was interesting to make a first status report on the adoption of these new trends.

Main recommendations made in 2013 and their level of maturity

In the course of our analysis, we found that oil and mining companies had made not inconsiderable progress in terms of rolling out human rights policies.

The publication of the *UN Guiding Principles*\* on Business and *Human Rights*\* in 2011 was a milestone for the consideration of human rights in the corporate world. It defined an authoritative conceptual framework and set

concrete recommendations, on which most mining and energy actors based themselves to instil fresh momentum in their engagement for human rights.

This new impetus can also be felt concerning the *Voluntary Principles on Security and Human Rights (VPSHR)*\*, which are increasingly followed.

ISSUE	MATURITY	MAIN AREAS OF PROGRESS
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○○	<ul style="list-style-type: none"> <li>➤ Better integrate human rights issues in functions and processes</li> <li>➤ Strengthen training programmes to create a culture of human rights</li> </ul>
SUPPLY CHAIN	○○○	<ul style="list-style-type: none"> <li>➤ Extend the scope of human rights issues in the supplier relationship</li> <li>➤ Assist suppliers, influence in Joint Ventures</li> </ul>
SECURITY FORCES	○○	<ul style="list-style-type: none"> <li>➤ Report transparently on risk exposure and consideration of the human rights and armed forces issue</li> </ul>
GRIEVANCE MECHANISMS	○○	<ul style="list-style-type: none"> <li>➤ Streamline and systematise grievance mechanisms at operational level</li> </ul>
PERFORMANCE INDICATORS & EXTERNAL AUDITS	○	<ul style="list-style-type: none"> <li>➤ Define relevant indicators with the industry so as to report on performance to all stakeholders.</li> <li>➤ Provide evidence</li> </ul>

\* Definition in glossary

### Reminder of good practices identified

KEY THEMES	BEST PRACTICES
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	<ul style="list-style-type: none"> <li>➤ Formalised, legible policies based on international standards.</li> <li>➤ Clear strategy including objectives and detailed roadmap.</li> <li>➤ Integration of UN Guiding Principles.</li> <li>➤ Works in collaboration with <i>IPIECA*</i> (global oil and gas industry association for environmental and social issues), <i>DIHR*</i> (Danish Institute for Human Rights) or other pertinent working group.</li> <li>➤ Top management support.</li> <li>➤ Integration in risk management and project cycle processes.</li> <li>➤ Analysis of gaps between <i>UN Guiding Principles*</i> and internal policies.</li> <li>➤ Transparency and details on the entire due diligence process (themes, trigger thresholds, type, frequency, teams, etc.).</li> <li>➤ Policies on land use, involuntary resettlements and indigenous people.</li> <li>➤ Application of <i>IFC*</i> standards.</li> </ul>
SUPPLY CHAIN	<ul style="list-style-type: none"> <li>➤ Integrate human rights issue in contracts and audits.</li> <li>➤ Integrate human rights issue in due diligence of key suppliers.</li> <li>➤ Cascade integration in suppliers' supply chain.</li> </ul>
SECURITY & HUMAN RIGHTS	<ul style="list-style-type: none"> <li>➤ raining, supervision, monitoring.</li> <li>➤ Application of recommendations and/or member of <i>Voluntary Principles on Security and Human Rights*</i> (VPSHR).</li> <li>➤ Reporting on VPSHR implementation.</li> <li>➤ Transparency on risk areas.</li> <li>➤ Indication of efforts with public armed forces.</li> </ul>
STAKEHOLDER COMPLAINTS MECHANISM (GRIEVANCE MECHANISMS)	<ul style="list-style-type: none"> <li>➤ Transparency on roll-out and tools, communication, handling, audit, control, independence.</li> <li>➤ Coherence with <i>IPIECA*</i> recommendations.</li> </ul>
PERFORMANCE INDICATORS & EXTERNAL AUDITS	<ul style="list-style-type: none"> <li>➤ Integration in internal audit.</li> <li>➤ Development of indicators and pilots via the industry's think tanks.</li> <li>➤ External audits such as <i>Goodcorporation*</i>, <i>CDA*</i>, or based on the upcoming <i>RAFI*</i> reporting standard.</li> <li>➤ Publication of results.</li> </ul>
CONTROVERSY	<ul style="list-style-type: none"> <li>➤ No controversy.</li> <li>➤ Suitable response (rapid public response and corrective actions).</li> </ul>
TRAINING	<ul style="list-style-type: none"> <li>➤ Integration in existing training programmes.</li> <li>➤ Specific training for the different key jobs.</li> <li>➤ Focus on lean management, top executives and sensitive functions.</li> <li>➤ Security training</li> </ul>

\* Definition in glossary

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## Changes in corporate practices

In 2013, we chose to initiate our engagement approach by focusing on the issue of human rights in the extractive sector (oil and mining industries). While many ESG issues are prominent in this industry, we felt it was important to open dialogue on this overarching theme in light of the level of risk exposure, repeated violations and low level of transparency or maturity of sector companies. Two years after the adoption of the *UN Guiding Principles\**, it also seemed appropriate to assess whether John Ruggie's work had created any real momentum in extractive companies, and how they would take up this new tool.

Clearly, the momentum, the trend in favour of human rights has been accelerating in the last two years. This can be seen in corporate performances, in the regulatory environment and in industry initiatives. Our initiative is not isolated: the *UNPRI\** also launched a broad shareholder coalition in 2015, which we joined, and which will make it possible to engage in dialogue with a panel of around fifty oil and mining companies. Our colleagues from Aviva, Calverts and Nordea have also launched the *Corporate Human Rights Benchmark\**, a promising initiative that will ultimately lead to evaluating 500 large companies at global level. More targeted initiatives, such as *Ranking Digital Rights\**, specialised in the human rights impact of companies in the information technology sector, have also emerged.

In legal terms, the momentum is also undeniable. Since the collapse of the Rana Plaza in Bangladesh in April 2013, France has been working towards imposing a duty of vigilance on parent companies. In March 2015, the United Kingdom introduced legislation requiring companies to take preventive measures against modern slavery at their suppliers. These national measures are in line with the strengthening of transparency requirements for companies at European level (directive 2014/95/EU).

Finally, a heated international debate has started, in the wake of the success of the *UN Guiding Principles\**, on the advisability of moving towards a binding treaty on the responsibility of multinationals in terms of human rights.

Concerning the companies in our panel, has there been a similar trend since 2013? The first observable trend is the operational implementation of these principles, which is good news. Since 2013, the companies with whom we have spoken have devoted most of their efforts to integrating human rights in their processes; the work on governance has consisted mainly in updating policies to fine-tune their compatibility with the *UN Guiding Principles\** wherever necessary. Generally speaking, although oil companies are entering an era of slower, less spectacular progress (most of the big announcements have already been made), but they are now concentrating on the substantive work that consists in instilling a true culture of human rights and building it into operations on a daily basis, function by function and division by division. A lengthy undertaking for companies as complex as integrated oil companies. From this point of view, progress is particularly significant when it comes to integrating human rights in the supply chain, a major risk area for which companies have rolled out additional actions in terms of training, risk identification, audit and support for subcontractors. On the other hand, regarding performance indicators, for which we had found the industry to be insufficiently transparent, progress is poor and practices still as mixed. While companies acknowledge the interest of a repository such as *RAFI\**, no sector player has yet committed formally to an effort of transparency based on this standard. To sum up, the topic of human rights continues to benefit from a clearly salutary momentum. We will continue to engage in dialogue on this theme, over and above the positive convergence of market initiatives and the legislative agenda, in order to monitor the lengthy integration work that is now starting.

\* Definition in glossary

# ARCELORMITTAL

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○○	▲	●	<p>ArcelorMittal has succeeded in maintaining a positive momentum on its human rights strategy through a policy signed and validated by its top management (the Chairman and Chief Executive Officer as well as six other members of the Board of Directors). In 2014, the company refocused its global strategy on 10 pillars taking better account of the potential impacts of its activity. Human rights form an integral part of these 10 pillars. This reorganisation enables the company to go further in aligning its policies with the <i>UNGP</i>* (United Nations Guiding Principles).</p> <p>Human rights are also included in the risk analyses. The company is working more specifically on setting up a guide of good practices on the relocation of displaced populations. Furthermore, the human rights policy applies to subcontractors and suppliers, in addition to the "Code for Responsible Sourcing" which shows how ArcelorMittal works with its suppliers and formalises the minimum requirements, notably for health and safety and human rights, among others.</p> <p>Since our last report, the percentage of employees having received training on human rights has decreased and now amounts to 76%, over the last three years up from 86% at end-2013.</p>	<ul style="list-style-type: none"> <li>➤ Continue aligning the company's policies with the <i>UN Guiding Principles</i>*</li> <li>➤ Have a third party audit the roll-out of its policy</li> <li>➤ Establish a human rights risk mapping</li> </ul>
SUPPLY CHAIN	○○○	▶	●	<p>With its Code for Responsible Sourcing, the company demonstrates its determination to integrate human rights into its supply chain. To go further, the company could strengthen its auditing procedures so as to be able to measure its application throughout its supply chain.</p> <p>ArcelorMittal assesses 181 suppliers (65% of its suppliers, which represent 100% of strategic suppliers) via a questionnaire. This assessment is completed by audits based on a risk approach.</p>	<ul style="list-style-type: none"> <li>➤ Encourage suppliers to integrate its considerations in their own supply chain</li> <li>➤ Develop assessment indicators and publish them</li> </ul>
SECURITY FORCES	○●	▶	○	<p>Human rights have been integrated in the company's security policy since 2011.</p> <p>In 2014, ArcelorMittal appointed a head of security for its Mining activity. His primary mission is to assess the current situation and suggest avenues of improvement.</p> <p>As we mentioned in 2013, this policy of managing security forces at its sites is based on the <i>Voluntary Principles on Security and Human Rights</i>* (VPSHR), of which the company is not a signatory, however.</p>	<ul style="list-style-type: none"> <li>➤ Increase transparency on the respect of human rights when securing sites in high-risk countries.</li> <li>➤ Formalise company's engagement in respect of <i>Voluntary Principles on Security and Human Rights</i> (VPSHR)*.</li> </ul>
STAKEHOLDER COMPLAINTS MECHANISM	○○○	▶	●	<p>The company has developed a network of local contacts and publishes local reports on its relations with the communities. The company's central objective is to understand the expectations of local communities related to the nature of its operations.</p> <p>Stakeholder complaints mechanisms are also set up locally, as well as an engagement plan. For example, in Liberia, AM organised a consultation forum (consisting of employees, stakeholders, villagers, etc.) in order to</p>	<ul style="list-style-type: none"> <li>➤ Continue optimising complaints mechanisms and report on this issue</li> <li>➤ Develop KPIs on complaints management: how are complaints solved? What is the satisfaction level?</li> </ul>
PERFORMANCE INDICATORS & AUDITS	○○○	▶	●	<p>Between 2013 and 2015, the company published no new monitoring and performance indicators that would have made it possible to assess its human rights policy. Mechanisms and policies have been implemented, however.</p> <p>ArcelorMittal communicates only on the percentage of people trained in human rights, without providing more details on the progress made in terms of human rights policies in its internal process.</p>	<ul style="list-style-type: none"> <li>➤ Implement relevant indicators to assess the real impact of the company's actions</li> <li>➤ Have actions validated by external audits</li> </ul>

DYNAMIC: ▲ positive ▶ neutral ▼ negative

RECOMMENDATIONS: ● followed ● partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

# ANGLO AMERICAN

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○○	▲	●	<p>Following Anglo American's global strategy, the company has pursued its efforts to integrate human rights issues. Since 2013, the company has published a formalised human rights policy and has implemented at all sites via the Social Way. Furthermore, the company fixed an internal requirement for all operations to be fully compliant with new Social Way requirements, which include HRs Due Diligence and the Voluntary Principles, by end 2016.</p> <p>The company has integrated a due diligence process in its procedure. Progress in compliance has been made in particular on the integration on the Voluntary Principles and Human right's Due Diligence process. .</p> <p>The company has been able to benefit from the experience of NGOs and the expertise of human rights research centers. Anglo American is also a member of several intra-sector initiatives. As leader of the industry the company could go even and transposing this knowledge into its internal process and developing innovative and concrete actions or new indicators in terms of human rights.</p>	
SUPPLY CHAIN	○○	➤	◐	<p>Since 2013, Anglo American continued to apply the Supply Chain code of conduct and a risk-based selection policy. The signature of the code of conduct and the self-assessment questionnaire are attached to all service provider contracts. The company has also implemented training sessions, including on human rights, for suppliers. In 2014, more than 7,340 suppliers attended these sessions. Anglo American has also distributed 5,500 guides of "good conduct" intended for suppliers. The company estimate that "the number of incidents of complaints has decreased substantially " after that.</p> <p>The company expects the finalisation UK Modern Slavery Act and after will evaluate further action to ensure more effective control of its supply chain.</p>	<ul style="list-style-type: none"> <li>➤ Increase transparency concerning controls performed and report on them</li> </ul>
SECURITY FORCES	○○	➤	◐	<p>A signatory of the <i>Voluntary Principles on Security and Human Rights*</i> (VPSHR) since 2005, the company ensures that security firms are duly registered in the countries in which it operates.</p> <p>Anglo American has developed a partnership with the NGO "International Alert" to prevent risks of human rights violation in its operations in South Africa and other countries in Latin American. International Alert" benchmarks site performance and offers advice as to how to enhance VPSHRs compliance.</p> <p>Operating through international security firms, the company has developed a supervision system on local contractors of these operators but the company doesn't publish detailed reporting on this.</p>	<ul style="list-style-type: none"> <li>➤ Provide more detailed reporting on VPSHR's implementation in higher risk setting</li> </ul>
STAKEHOLDER COMPLAINTS MECHANISM	○○	▲	◐	<p>The process established in 2013 has not changed much. The company's complaints settling process is well structured on the whole and covers the entire human rights scope. Anglo American has implemented a scale to measure the severity of complaints and respond through a complaints mechanism or by instruments such as SEAT (Socio-Economic Assessment Toolbox). Anglo American has an overall objective: zero serious complaints.</p> <p>However, despite the figures provided on this subject, the company does not disclose setting performance indicators on the subject.</p>	<ul style="list-style-type: none"> <li>➤ Develop indicators to demonstrate the effectiveness of complaints mechanism</li> </ul>
PERFORMANCE INDICATORS & AUDITS	○○	➤	◐	<p>The process established in 2013 has not changed much. The company's complaints settling process is well structured on the whole and covers the entire human rights scope. Anglo American has implemented a scale to measure the severity of complaints and respond through a complaints mechanism or by instruments such as SEAT (Socio-Economic Assessment Toolbox). Anglo American has an overall objective: zero serious complaints.</p> <p>However, despite the figures provided on this subject, the company does not disclose setting performance indicators on the subject.</p>	<ul style="list-style-type: none"> <li>➤ Have information checked by independent third parties</li> </ul>

DYNAMIC: ▲ positive ➤ neutral ▼ negative

RECOMMENDATIONS: ● followed ◐ partially followed recommendations and/or being introduced ◑ not followed — no recommendations issued in 2013

\* Definition in glossary



THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS				<p>Since 2013 and the launch of our engagement approach, OMV has continued to rework its human rights policy. Currently, OMV's policy is still being revised and updated. One of our recommendations was to align the existing policy on the John Ruggie principles (UN Guiding Principles) and to report thereon. During our last exchanges, the company reiterated its determination to be aligned on and consistent with these principles.</p> <p>For 2015, the company planned to continue the human rights training actions initiated in 2014. As a reminder, this concerned employees in Algeria, Austria, Gabon, Kurdistan, Madagascar, Namibia, New Zealand, Romania, Pakistan and Tunisia.</p> <p>That said, the positive momentum identified in 2014 seems to be running out of steam. We encourage the company to press on with the changes required for this structural adjustment</p>	<p>► Align existing policy on John Ruggie principles and report thereon</p>
SUPPLY CHAIN				<p>Like in 2014, the company specified out that its main subcontractors have received specific human rights training. In parallel, OMV has kept to the same guideline regarding the supply chain. The company requires that its partners formalise their commitment to respect human rights by contract.</p> <p>Controls still need to be strengthened, as well as external audits.</p>	<p>► Strengthen controls and provide evidence through external audits</p>
SECURITY FORCES				<p>OMV systematically assesses security conditions in the countries where it intends to operate. This is relevant because the company is present in geographic regions where geopolitical and political tensions are (or tend to be) increasingly recurrent. Cases in point are Libya and Tunisia, where the level of security risk increased sharply following the advent of the Arab spring.</p> <p>In parallel with monitoring the evolution of the security situation in these risk areas, the company constantly ensures that optimum security conditions are guaranteed/preserved for employees. In Libya and Iraqi Kurdistan, OMV controls security conditions on a daily basis. Thus, even though some site evacuations were necessary in Libya (risk becoming too high), the company manages to ensure business continuity everywhere while ensuring its employees' security.</p> <p>To secure operations in countries at risk, OMV works in close collaboration with security intelligence services. This enables the company to quickly take measures corresponding to the detected risk. This was the case when tensions increased around operations in the South Tunisian desert.</p> <p>Since the launch of our engagement policy in 2013, OMV has made progress on the "security forces" criterion. The company must continue to work on transparency, however, regarding respect of the human rights aspect when securing sites in high-risk countries (notably Libya) and the use of public armed forces.</p>	<p>► Increase transparency on the respect of human rights when securing sites in high-risk countries (notably Libya) and the use of public armed forces</p>
STAKEHOLDER COMPLAINTS MECHANISM				<p>As we noted in 2013, OMV implemented a complaints management and settlement mechanism for all stakeholders in 2011 (see 2013 Engagement Report). Initially, this mechanism was only rolled out in Romania, but the company took a step forward in 2014 by implementing a series of tools to standardise and implement it in all E&amp;P (Upstream) sites. In actual fact, stakeholder complaints mechanisms have now been set up in Romania, Pakistan and Yemen.</p> <p>In practice, complaints are processed (and settled) locally by officials of the sites concerned. OMV demonstrates true willingness to be transparent about these mechanisms. According to the latest figures published (base 2014), of 857 complaints reported in Romania (mostly relating to societal topics) 660 were resolved, in Yemen 4 out of 5 were resolved, while none were recorded in Pakistan. OMV told us that unsolved cases remained under investigation. Updated data will be available in the coming months, but we already note that none of the complaints concerned human rights.</p> <p>In parallel, in 2014, OMV Petrom put in place an <i>Ombudsman</i>* whose principles are based on independence, neutrality and confidentiality.</p>	
PERFORMANCE INDICATORS & AUDITS				<p>Between 2013 and 2015, OMV defined new indicators, in line with our recommendation to introduce relevant indicators to assess the real impact of actions. These performance measures are aimed at OMV employees as well as main subcontractors. In 2015, the group provided details on its methodology for monitoring these indicators, specifying that they were followed and updated twice a year and that results were discussed with management. However, few details are provided regarding these indicators.</p> <p>All of the information provided in OMV's sustainable development report is validated by external audits. The human rights aspect is covered by these controls, which are also performed on key subcontractors.</p>	<p>► Continue rolling out performance indicators and report thereon</p>

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed no recommendations issued in 2013

\* Definition in glossary



THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○○	▲	●	<p>Total already had a relatively robust system in place, with a specific policy made public in 2011 as well as a detailed practical guide and a strategic roadmap on human rights combined with objectives. Since then, Total has implemented a new Code of Conduct with a clearer focus on human rights, notably aiming to update references to major standards which have evolved over the last ten years. Total has organized a Business Ethics Day focused on Human Rights and anti-corruption on the 9th of December; Total has also updated its specific policy in 2015.</p> <p>An Ethics and Human Rights unit has been created to ensure coordination and legal expertise. A lot of work this year on M&amp;A to identify the risks associated with human rights. Total has created tutorials and a guide to help the company's M&amp;A lawyers apply human rights guidelines based on the <i>UNGPs</i>*.</p>	
SUPPLY CHAIN	○○○	▲	●	<p>Purchasing is highly decentralised within the company, which represents a challenge in terms of harnessing and harmonising practices. That said, even though this is a field in which it is traditionally less alert, Total has implemented several elements to gradually integrate issues relating to human rights. The company has implemented a sustainable procurement working group which includes human rights. A Charter of fundamental principles attached to supply contracts is also being rolled out and should gradually become an integral part of practices. Total organises training sessions for its buyers via the Danish Institute. The company participates in the <i>IPIECA</i>'s* working group on the supply chain, enabling it to exchange views with its big suppliers so as to promote the emergence of a shared database of supplier audits including the human rights theme.</p>	<p>► Increase transparency concerning controls performed and report on them</p>
SECURITY FORCES	○○	▶	●	<p>Total is continuing to implement its major guidelines on the subject. The company applies its best efforts to systematically negotiating agreements with public security forces. In the Democratic Republic of Congo, for example, during a seismic campaign, Total supported an awareness campaign for armed forces and signed a memorandum of understanding on the human rights theme at regional level. The company is attentive to the issue of equipment transfers, fine-tuning its risk assessment models and better formalising its hiring process.</p> <p>The company is also involved in establishing the future ISO 18788 standard, which aims to qualify a management system for private security operations, a good way of professionalising the security industry and better integrating human rights issues.</p>	<p>► Provide more detailed reporting on implementation of <i>Voluntary Principles on Security and Human Rights</i>*, in particular in the most risky countries</p>
STAKEHOLDER COMPLAINTS MECHANISM	○○○	▶	—	<p>Total was already engaged significantly in rolling out complaints mechanisms at field level. The company drew on the good practices of some units (especially in Yemen) to create a grievance mechanisms policy for local communities at group level. The E&amp;P division is the leader in this area and already has a launch plan with internal indicators based on societal risks. It has not yet been rolled out by all the subsidiaries at this point. Once the roll-out has been completed, the company will have to measure the system's effectiveness. Total is working with the <i>IPIECA</i>* on industry guidelines, notably through a pilot project in Congo.</p>	<p>► Report on roll-out of stakeholder complaints mechanisms and their effective use</p>
PERFORMANCE INDICATORS & AUDITS	○	▶	●	<p>Total is closely associated with <i>Shift and Mazars' work</i>* on establishing a recognised framework for human rights reporting. The company's former legal director has sat on the <i>RAFI</i>* expert committee. The company is studying the possibility of rolling out the tool internally to test it, without however setting any publication objectives at this stage.</p>	<p>► Define and publish KPIs on human rights</p>

DYNAMIC: ▲ positive ▶ neutral ▼ negative

RECOMMENDATIONS: ● followed ● partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

# SHELL

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○	➤	—	Shell has implemented a set of relatively robust policies and processes. The company has pursued its strategy of integrating human rights in its operational processes, without introducing any significant new policies and processes	
SUPPLY CHAIN	○○○	➤	—	Shell continued to fine-tune its integration of human rights issues in its supply chain. Examples are First, the company's approach to an audit program for merchandise suppliers. Second, in 2014, Shell published an Accommodation and Welfare Guide to set a global standard for the living conditions of employees and subcontractors on large construction projects, who sometimes spend long periods of time away from home.	
SECURITY FORCES	○○	➤	●	The company, like its peers, has noted a rise in terrorism and violence, particularly in the Middle East. Accordingly, Shell has stepped up its investments in security and continues to apply its standard human rights risk assessment approach based on the <i>VPSRH*</i> , of which it is a signatory. It also performs an annual compliance update. The company reports fairly broadly on its efforts in this respect (apart from three interesting and seldom-used indicators in the sector on the percentage of countries resorting to armed security forces). Because of the risk exposure, it would be important to learn more about the measures taken in high risk countries (Iraq, Nigeria in particular).	➤ Continue reporting efforts on implementation of <i>VPSRH*</i> in high-risk countries
STAKEHOLDER COMPLAINTS MECHANISM	○○○	➤	●	Since 2012, Shell has been reporting the number of grievances expressed by communities. 100 subsidiaries passed on information in 2014. All of the company's major projects (including all upstream projects and all significant downstream projects) have to implement and operate a complaints mechanism. Shell has contributed a project as part of the <i>IPIECA*</i> 's working group on this subject. The human rights team is currently focusing on helping subsidiaries to roll out complaints mechanisms and improving the IT system for monitoring.	
PERFORMANCE INDICATORS & AUDITS	○○	➤	—	Shell has developed a large number of public indicators on human rights. Despite the fact that a number of these KPIs are no longer progressing (having reached a stable score of 100%), Shell does not wish to change its set of indicators, estimating that their stability is a strong point.	

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed — no recommendations issued in 2013

\* Definition in glossary

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	1	➤	🟡	After having completed an assessment exercise to measure the gaps between its practices and the <i>United Nations Guiding Principles (UNGP)</i> * and based on consultants' recommendations, BP's human rights policy has been developed and integrated within the company through a cross-functional, inter-business, essentially risk-based approach.  However, as we had previously recommended in 2013, the company would do well to describe in more detail its implementation plan framework for human rights to give BP's stakeholders a more precise view on the far-reaching integration work that is	➤ Communicate more information on the company's Human Rights roadmap (goals, expected outcomes)
SUPPLY CHAIN	3	➤	🟢	The group has adopted a cross procurement approach and has focused a lot of its efforts on risk identification and risk segmentation. Since 2014, BP has included human rights clauses in some of its standard contracts with suppliers in its upstream and downstream businesses and continues to encourage them to adhere to the principles contained in its human rights policy. In some locations, BP also conducts supplier social performance audits, covering human rights issues such as forced labour, working hours and conditions. This should pave the way for more comprehensive social performance audits. BP has communicated concrete examples and figures showing that in two years, the company has made progress in this area.	➤ Communicate on progress made in integrating Human Rights in the company's supply chain.
SECURITY FORCES	3	➤	—	BP has developed detailed <i>VPSHR</i> * implementation guidelines and has again released its annual <i>VPSHR</i> implementation report, showing a unique level of transparency in this area. The group also develops interesting new approaches to security like <i>Tanggung</i> in Indonesia, an extremely sensitive environment where it implemented an innovative community-based security strategy.	
STAKEHOLDER COMPLAINTS MECHANISM	2	➤	🟡	The company has implemented a management system that requires projects and businesses to handle local stakeholder grievances. BP is in the process of assessing existing community grievance mechanisms according to the <i>UNGPs</i> * and <i>IPIECA</i> *'s recently published guidance document (which BP co-led) in order to identify areas for improvement. The group could provide more details on the advancement of its work on grievance mechanisms as well as publish data concerning their effectiveness.	➤ Systematically apply good practices in terms of grievance mechanisms.
PERFORMANCE INDICATORS & AUDITS	2	➤	🟡	As BP applies a risk-based approach, it does not communicate specific human rights indicators. The company has performed social and performance audits that include human rights components in some countries. BP continues to publish sustainability reports for selected countries of operation (Azerbaijan, Angola, Georgia, Oman), which can give an indication of the deployment of Human Rights policies at local level.	➤ Publish performance indicators on Human Rights.

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed — no recommendations issued in 2013

\* Definition in glossary

# STATOIL

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○○	▲	—	Statoil has maintained a strong human rights policy, making it one of the best in the sector. The human rights policy is detailed and integrated in the company's processes. The company also has a clear policy on specific human rights topics, e.g. population displacement, respect for indigenous peoples and preventing human rights violations. As indicated in our previous report, the due diligence process is integrated way upstream and impacts all of the company's processes.  The company has made further progress by integrating human rights at the heart of its governance through specific committees at the highest corporate level.	
SUPPLY CHAIN	○○	▲	●	Statoil continues to select service providers and contracts based on its responsible policies, notably in terms of human rights. The company supports its suppliers through training programmes and has implemented a supplier monitoring mechanism in respect of human rights, with qualitative and quantitative indicators. The company also discloses the number of audits and checks performed on its supply chain in its sustainable development report.	
SECURITY FORCES	○○○	▲	●	Statoil has selected the countries in which contracts with security companies were necessary. The company has implemented a stringent policy for the recruitment and monitoring of security companies, referring to the sector's reference texts on this subject. The company continues to provide human rights training to employees of security companies and also offers this service in its joint ventures.	
STAKEHOLDER COMPLAINTS MECHANISM	○○○	➤	●	Grievance mechanisms are accessible, transparent and compatible with local cultural environments. Based on a pilot project as part of the IPECA, the company has duplicated local mechanisms in certain countries in close proximity with communities, using community liaison officers. In March 2015, Statoil also launched a specific tool box for implementing grievance mechanisms in order to help the operational units set up these mechanisms and report on the progress made.	<ul style="list-style-type: none"> <li>➤ Systematically roll out these mechanisms to all operations, including joint ventures, on a risk based approach</li> </ul>
PERFORMANCE INDICATORS & AUDITS	○○	➤	○	Statoil's sustainable development report has been verified by an external auditor, which is an improvement since our previous exchange in 2013. The company continues its effort to develop effective training through its ties with the academic community and wants to review its measurement indicators in 2016.	<ul style="list-style-type: none"> <li>➤ Communicate relevant indicators</li> <li>➤ Have actions validated by external audits.</li> </ul>

DYNAMIC: ▲ positive ➤ neutral ▼ negative

RECOMMENDATIONS: ● followed ● partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

THEMES	LEVEL (TIO <sup>3</sup> )	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○○	➤	—	<p>BG is gradually strengthening its human rights policies and processes, which are already very advanced.</p> <p>Given the growing interest of its stakeholders and the extent of the international debate on human rights, BG issued a new position paper in 2015 on human rights issues, detailing the processes governing the application of its human rights policy (which was published in 2011).</p> <p>BG continues to perform human rights impact assessment before even starting operations well ahead of entering new territories, as was the case in Myanmar (two risk assessment studies done before the start of operations).</p> <p>The company also studies conflict dynamics in some of the countries in which it operates. BG commissions external assessments on its potential interaction with existing conflict dynamics and the potential risks for rights holders and for BG, based on which it draws up recommendations, a work plan and a framework for engagement.</p> <p>The company is extremely proactive in light of its relative risk profile.</p>	
SUPPLY CHAIN	○○○	➤	—	<p>BG has continued rolling out its Guidelines on Identifying and Managing High Risk (Key) Contracts. Each key contract (defined according to ethical risk, health &amp; safety risk, social performance or human rights) must now include a contract management plan identifying key risks and how to manage them. Sharing of best practices on these two points.</p> <p>During supplier audits, the detection of a red flag results in the suspension of the business relationship until the risk is assessed locally or a mitigation measure is implemented.</p> <p>Furthermore, for JVs in which the company is not the operator, BG strives to promote best practices. In Myanmar, the joint venture agreement, under BG's influence, refers to the <i>UNGP</i>'s and <i>VPSHR</i>'s. Since then, the company's partner has become a signatory of the VPs.</p>	
SECURITY FORCES	○○○	➤	●	<p>In 2014, BG performed an internal assessment of all the GMs in place in order to develop local plans for improvement. The company currently monitors several KPIs: number of complaints, response time and status of complaints.</p> <p>The company has continued its work on grievance mechanisms in Tanzania alongside <i>IPIECA</i>* and published the results of this pilot project. Three assets have used <i>IPIECA</i>* material for their needs (Tanzania LNG, Kenya, Myanmar).</p>	➤ Improve reporting on implementation of <i>Voluntary Principles on Security and Human Rights</i> * in risky countries
STAKEHOLDER COMPLAINTS MECHANISM	○○	➤	—	<p>In 2014, BG performed an internal assessment of all the GMs in place in order to develop local plans for improvement. The company currently monitors several KPIs: number of complaints, response time and status of complaints.</p> <p>The company has continued its work on grievance mechanisms in Tanzania alongside <i>IPIECA</i>* and published the results of this pilot project. Three assets have used <i>IPIECA</i>* material for their needs (Tanzania LNG, Kenya, Myanmar).</p>	
PERFORMANCE INDICATORS & AUDITS	○	➤	○	<p>BG still does not communicate specific indicators for human rights. The company considers the « UN Guiding Principles reporting framework » useful to understand investor expectations in terms of reporting on human rights, but has no plans to implement it in the short term.</p>	➤ Publish indicators on human rights

DYNAMIC: ➤ positive ➤ neutral ➤ negative

RECOMMENDATIONS: ● followed ● partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

# PETROBRAS

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	1	➤	○	<p>The company is upholding its commitments and providing more information on the integration of human rights in its project cycle. Although human rights are integrated in Petrobras' social responsibility policy, the company has still not defined a public human rights policy detailing its principles and engagements.</p> <p>The efforts in terms of training have decreased to 5,104 hours from 16,000 man-days in 2012.</p> <p>Petrobras cites several initiatives related to human rights outside Brazil (impact analyses in Bolivia and Argentina) that suggest a slightly more proactive roll-out of human rights engagements outside Brazil.</p>	<p>➤ Formalise company's engagement (public human rights policy)</p>
SUPPLY CHAIN	2	➤	◐	<p>In 2013, the company initiated a review of its supply contracts to integrate clauses on human rights and local development. In 2015, this project is still under review.</p> <p>The company does report progress, however, in the implementation of an original and courageous programme to fight the sexual exploitation of children and adolescents and combat domestic violence, in partnership with its distribution subsidiary. The company also disseminates messages for gender and colour equality in its supply chain.</p> <p>Petrobras also remains heavily exposed to risks of child and forced labour in its biofuels business. A number of initiatives are under way, but the company's strategy remains unclear.</p>	<p>➤ Implement integration of human rights clauses in subcontractors' contracts</p>
SECURITY FORCES	1	➤	○	<p>No new initiatives in this area where we had already pointed out significant failings in 2013.</p>	<p>➤ Clearly align the company's initiatives on the UN Guiding Principles* and VPSHR*</p>
STAKEHOLDER COMPLAINTS MECHANISM	2	➤	—	<p>At our meeting in 2013, Petrobras had already set up a high-quality operational grievance mechanism in Brazil. The company reports many detailed examples of its application in Brazil and the procedure followed to remedy the problems identified, which brings useful credibility to the approach. Outside Brazil, the company has started to report on the number of complaints (23 in Bolivia, 6 in Chile) and their nature, reflecting the internationalisation of these good practices.</p>	
PERFORMANCE INDICATORS & AUDITS	2	➤	—	<p>Petrobras produces the same indicators on specific human rights training initiatives, as well as statistics on the use of the grievance mechanisms (12 complaints in 2015, 10 settled during the year).</p>	

DYNAMIC: ▲ positive ➤ neutral ▼ negative

RECOMMENDATIONS: ● followed ◐ partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS OF RECOMMENDATIONS	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
HUMAN RIGHTS POLICY & DUE DILIGENCE PROCESS	○○○	▲	●	<p>Since 2007, Eni has succeeded in formalising its human rights policy and gradually integrating human rights in the company's management systems. Unlike many of its peers, the company is sharing human rights specific commitments (regarding land acquisition, human rights management system, training, audits of the supply chain) as part of its four-year strategic plan (2015-2018).</p> <p>Although these commitments could be more detailed and accompanied by more tangible and verifiable follow-up indicators, this provides a useful overview of the key issues for the group.</p>	
SUPPLY CHAIN	○○○○	▶	—	<p>With the publication of its "Guidelines on the Protection and Promotion of Human Rights" and code of ethics, which are integrated in supplier contracts, Eni shows it is committed to optimising and controlling respect of human rights throughout its value chain. The control procedure for new suppliers also guarantees an engagement in favour of human rights.</p> <p>The group has committed to define and implement a supply chain audit plan based on risk criteria relating to human rights by 2018.</p>	
SECURITY FORCES	●	▶	●	<p>Eni has implemented a due diligence process for hiring security companies. This procedure covers companies' track records and requires them to fill in a specific questionnaire on human rights. Contracts with security providers include an early termination-clause on human rights, more stringent than the current requirements included in the VPSHR, covering both workers' rights and local communities' protection. Starting from 2009, the company also organised training sessions on human rights for more than 2,100 employees of security companies in thirteen countries other than Italy.</p> <p>Given the number of high risk countries in which the company operates, more transparency on how it handles security companies would help assess its efforts in this area.</p>	<p>► Formalise the company's commitment to the VPSHR* and report on its deployment in high risk areas (notably Libya).</p>
STAKEHOLDER COMPLAINTS MECHANISM	○○○	▶	●	<p>Community Grievance Mechanisms is a requirement outlined in the Group's new Professional Operating Instructions issued in 2015. Thanks also to a cross-functional team, the process covers a broad range of issues. Site-level teams report on a number of targeted and strategic KPIs that are then used to improve the company's social performance. In 2014, six pilot countries (Mozambique, Congo, Angola, Pakistan, Kazakhstan, Nigeria) reviewed their CGMs based on the IPIECA* international best practices.</p>	<p>► Continue work to overhaul grievance mechanisms.</p>
PERFORMANCE INDICATORS & AUDITS	○○○○	▶	○	<p>Eni publishes a number of human rights indicators, enabling it to be ahead of many of its sector peers. These indicators, as stipulated in the last report, essentially concern resources and the company has made limited research to identify indicators measuring the effectiveness of its human rights policy.</p>	

DYNAMIC: ▲ positive ▶ neutral ▼ negative

RECOMMENDATIONS: ● followed ● partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

## Theme 2 - Fight against malnutrition and food waste in the food and food retail sectors

### Reminder of the theme

2.3 billion people worldwide suffer from obesity, malnutrition or chronic food-related diseases, i.e. almost one third of the world population. This affects both emerging and developing countries, with significant economic and social consequences. Against this backdrop, food companies and large retailers play an important role in the nutritional quality of the products they offer in the different markets, by adapting their products to local nutritional needs and making them more accessible to all populations, including the most disadvantaged. By developing healthy and safe products with nutritional profiles meeting the highest standards, these companies also improve their reputation and nurture a strong brand image.

Amundi's engagement aims at better understanding corporate health and nutrition strategies, access to products, notably for disadvantaged populations, and prompting companies to improve their practices. Concerning food waste, companies must implement tools to reduce their own waste and waste in the food chain, « from the farm to the table ». Fighting food waste and optimizing logistics chains also makes it possible to reduce costs while improving the company's reputation. Managing food waste is an increasingly central theme, which companies handle unevenly.



## Main recommendations made in 2013 and their level of maturity

Generally speaking, issues related to malnutrition, undernutrition and improving the nutritional quality of products seem to be well factored by companies, although some players are lagging slightly. Implementation of adequate policies and strategies is becoming widespread. By contrast, we note that access to food is one of the areas with the greatest room for improvement. Responsible marketing practices in the food sector are consistent and

in line with best practices, but we recommend that they be extended to a broader public. Concerning the fight against waste, the retail sector, although it still has a fair amount of room for improvement, is more advanced than the food sector and takes a more structured view of this issue. Actions on food waste would deserve to be more formalised, but our exchanges with companies indicate interesting prospects in this respect.

ISSUE	MATURITY	MAIN AREAS OF PROGRESS
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>		
<b>POLICIES AND STRATEGIES QUALITY AND NUTRITION</b>	●●●	<ul style="list-style-type: none"> <li>➤ Continue reformulating own-label products</li> <li>➤ Define reduction targets (salt, sugar, fat)</li> <li>➤ Report systematically on scientific control of health claims</li> </ul>
<b>ACCESS TO FOOD</b>	●●	<ul style="list-style-type: none"> <li>➤ Develop targeted initiatives in terms of appropriate pricing</li> <li>➤ Accelerate development of alternative distribution networks</li> </ul>
<b>MARKETING</b>	●●	<ul style="list-style-type: none"> <li>➤ Extend specific policies aimed at a broader public (children over 12)</li> </ul>
<b>REDUCE FOOD WASTE</b>		
<b>POLICIES AND STRATEGIES VALUE CHAIN: ANALYSES AND ACTIONS IMPLEMENTED</b>	●	<ul style="list-style-type: none"> <li>➤ Implement a formalised policy</li> <li>➤ Identify areas of waste in the value chain</li> <li>➤ Create specific reporting associated with detailed objectives</li> <li>➤ Set targets and associated monitoring indicators</li> </ul>

### Reminder of good practices identified

KEY THEMES	BEST PRACTICES
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>	
<b>POLICIES &amp; STRATEGIES</b>	<ul style="list-style-type: none"> <li>➤ Precise policy, including qualitative (e.g. targeted populations) and quantitative objectives (e.g. proportion of portfolio reformulated).</li> <li>➤ Coherence with standards defined by national and international health authorities.</li> <li>➤ Procedure for monitoring implementation of corporate policy.</li> <li>➤ Monitoring and performance measurement indicators.</li> <li>➤ Communication on results, objectives, areas for improvement, etc.</li> </ul>
<b>QUALITY AND NUTRITION</b>	<ul style="list-style-type: none"> <li>➤ Reformulation and optimisation strategy.</li> <li>➤ Specific R&amp;D dedicated to improving products' nutritional quality.</li> <li>➤ Transparency about the proportion in the portfolio of products with optimal nutrition quality.</li> <li>➤ Clinical studies and scientific validation.</li> <li>➤ Consumer impact measurement.</li> <li>➤ Nutritional labelling.</li> <li>➤ Product responsibility.</li> <li>➤ Nutritional claims controlled and validated scientifically.</li> </ul>
<b>ACCESS TO FOOD</b>	<ul style="list-style-type: none"> <li>➤ Objectives and policy in terms of affordable products.</li> <li>➤ Responsible pricing structure.</li> <li>➤ Development of initiatives (products adapted to specific local characteristics, implementation of alternative distribution methods, etc.)</li> <li>➤ Mapping of specific products, monitoring and reporting on actions undertaken.</li> <li>➤ Launch of fortified products compensating recurring deficiencies.</li> </ul>
<b>MARKETING</b>	<ul style="list-style-type: none"> <li>➤ Responsible marketing, notably for products intended for children (at the very least, compliance with <i>EU Pledge*</i> and <i>IFBA*</i>).</li> <li>➤ Extend criteria of EU Pledge and <i>IFBA*</i> to children over 12, secondary schools and all media.</li> </ul>
<b>REDUCE FOOD WASTE</b>	
<b>POLICIES &amp; STRATEGIES</b>	<ul style="list-style-type: none"> <li>➤ Clear and precise anti-waste policy with detailed objectives and areas for improvement.</li> <li>➤ Monitoring procedure supported by qualitative and quantitative indicators.</li> <li>➤ Impact on variable remuneration.</li> </ul>
<b>VALUE CHAIN: ANALYSES AND ACTIONS IMPLEMENTED</b>	<ul style="list-style-type: none"> <li>➤ Studies intended to improve and optimise supply chain.</li> <li>➤ Draft mapping of waste.</li> <li>➤ Identify hotspots in the value chain.</li> <li>➤ Cooperate with all stakeholders (government bodies, producers, suppliers, consumers, etc.).</li> <li>➤ Implement targeted action plans.</li> <li>➤ Responsible packaging adapted to real needs.</li> <li>➤ Definition and roll-out of a management process for unsold goods.</li> <li>➤ Structuring of food donations.</li> </ul>

\* Definition in glossary

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## Changes in corporate practices

**Nutrition and food waste are more topical than ever.** Over the past two years, these themes, identified as priorities by the economic actors concerned (see introduction), have been sparking political debate and are regularly taken up by the media. A real momentum seems to be arising around these topics, as evidenced by the multitude of start-ups working on this issue and developing increasingly well-structured and effective tools and applications. Our panel companies have also continued to perform well. Although disparities remain, the players we met are undeniably progressing on several analysis criteria used to assess their positioning.

While the trend is positive for the two themes, progress has been more significant concerning waste than nutritional aspects. Companies have integrated the improvement of products' nutritional qualities in their strategy for many years now. On the other hand, the fight against food waste is a more recent topic on which companies are generally less mature. This leaves room for further improvement in this field, which is currently prominent in the political debate in France (e.g. French Minister of Ecology Ségolène Royal's debate with retailers in 2015).

Concerning **food waste reduction**, food donation management programmes are increasingly well structured in the retail sector. For instance, a growing number of stores are setting up systematic relationships with charities. Food groups are progressing from year to year but are generally less mature than retailers at this level. So, while the trend is undeniably positive, engagements are generally in the form of a charter and/or through local partnerships. Food groups would benefit from putting in place better structured policies and programmes. From a more operational viewpoint, in the retail sector, the trend is towards a generalisation of studies to identify waste hotspots in the value chain of selected foods. One observation that applies to both sectors is that programmes to combat food waste are often limited to companies' home countries, despite some efforts to export good practices. In food, we identified a few programmes

often focusing on a single type of agricultural commodity to optimise the value chain and avoid waste. However, these programmes still lack formalisation. Reports quantifying the gains associated with the reduction of food waste are still very vague and too limited. The lack of standardised metrics illustrates the situation perfectly: companies refer to breakage rates, markdown rates, proportion of sales, etc.

Regarding **nutrition seen from the angle of malnutrition, undernutrition and improvement of products' nutritional quality**, the practices of the companies in our study are also trending positively. Players show a real desire to improve constantly in this area, which was already addressed thoroughly in 2013. The nutritional policies implemented are increasingly solid. The main objectives concern the target percentage of healthy products sold (in relation to all the products sold) for retail and the percentage of products with the most interesting nutritional characteristics for the food industry. Most companies have defined and set up complementary targets together with specific indicators to monitor their performance against the steps taken. Even though some players who entered the race more recently are logically lagging behind, most companies are coming to the end of the nutritional profile improvement phase and believe it will be difficult to go any further in the process without altering products' taste. Regarding access to nutrition, most retailers offer a range of low-priced products with high nutritional quality. The increase in sales for these product lines bears witness to the relevance of the strategy consisting in promoting these healthy and inexpensive products. Agri-businesses, however, are not very clear about their product ranges for low-income people. Lastly, a number of large retailers have continued to roll out their range of fortified products in response to local specificities and deficiencies. The concept has been extended to other geographical regions. This also applies to the food groups that are working with local groups to further adapt their products to local needs.

Detailed fact sheets

# CASINO

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○	▲	●	<p>Casino has been strengthening its leadership in nutrition with each passing year. As early as 2013 and our first exchanges with the company, a certain maturity was evident. Casino's formal commitments, actions to reformulate products and cooperation with scientific experts confirm the company's good positioning. In 2015, Casino maintained this momentum, upholding its commitment to this issue.</p> <p>However, despite having introduced similar approaches in a number of countries (notably Thailand and Colombia), the company's strategy outside France remains less formalised. Similarly, the dissemination of good practices and the means implemented to do so still need improving.</p>	<ul style="list-style-type: none"> <li>➤ Continue exporting the nutritional know-how acquired in France</li> <li>➤ Develop training actions on nutrition for employees</li> </ul>
<b>QUALITY AND NUTRITION</b>	○○	➤	—	<p>In a consolidation phase at our previous meeting, the optimisation of products' nutritional profile is now fully integrated in Casino's processes. In recent years, the company has made consumers' nutritional education a priority. Several awareness programmes have been introduced.</p> <p>More recently, striving to constantly improve its products, Casino launched a study focusing on two new areas: the impact of pesticides and the role played by antibiotics.</p>	
<b>ACCESS TO FOOD</b>	○○○	▲	—	<p>As early as 2013, we stressed the company's excellent positioning on this criterion. This is characterised in particular by a pricing policy adapted to local features, or innovative initiatives such as the corner shop project in Colombia. This successful experience enabled Casino to export the concept to Thailand where, like in Colombia, the company has significant presence.</p> <p>Fortified products are also part of the relevant initiatives introduced in recent years.</p>	
<b>REDUCE FOOD WASTE</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○	➤	○	<p>In order to strengthen its policy on food waste, Casino is increasingly cooperating with start-up companies specialised in the development of waste reduction applications. The company has also extended training programmes on waste to all its employees so as to improve awareness on this issue.</p> <p>In the last two years, Casino's donations programme has become better structured, with several new projects conducted in parallel with the signing of agreements between shops and food associations.</p>	<ul style="list-style-type: none"> <li>➤ Strengthen policies on food waste</li> <li>➤ Continue structuring food donation programmes in small and medium-sized stores</li> </ul>
<b>VALUE CHAIN: ANALYSE AND ACTIONS IMPLEMENTED</b>	○○	➤	○	<p>As we mentioned in our previous report, Casino optimises food donations by store size and thus reduces food waste downstream of the value chain.</p> <p>The company analyses the breakage rate in its stores as a vector for waste reduction and combines it with performance criteria impacting employees' variable remuneration. The company should analyse in greater detail the supply chain of some target products so as to identify the areas generating the most food waste and implement specific action plans for its suppliers, along the lines of other sector players.</p>	<ul style="list-style-type: none"> <li>➤ Continue its engagement with suppliers in terms of reducing food waste (reducing loss rates, increasing the proportion of suppliers covered by programmes to fight food waste, etc</li> </ul>

DYNAMIC: ▲ positive ➤ neutral ▼ negative

RECOMMENDATIONS: ● followed ● partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○	▲	●	<p>As indicated in our previous report, Tesco has demonstrated its commitment to nutrition through its high-quality nutritional policy. This policy revolves around two main elements: internally, the company's communication plan designed for employees and externally, the "Healthy Little Difference Tracker" tool, still being rolled out, the first results of which will be published in 2016.</p> <p>As early as 2013 and our first exchanges with the company, Tesco indicated it had defined reformulation objectives to improve the nutritional quality of its portfolio, relying on a team of experts and accurate reporting. Since then, the company has clarified its objectives for reformulating and improving its products' nutritional profiles. Tesco has reviewed and updated its objectives, focusing on the reduction by 2017 of salt and sugar content and sodas' calorie content.</p> <p>In connection with our recommendation to extend the best practices identified in the UK to other countries, the company has notably developed a new brand, "VitaKids", in Slovakia, continued developing Healthy Appetites in Poland and broadened the use of "QR codes" in Thailand to inform consumers about products' nutritional profile.</p>	<ul style="list-style-type: none"> <li>➤ Continue extending best practices identified in the United Kingdom to foreign countries</li> <li>➤ Continue rolling out "Healthy Little Differences Tracker"</li> </ul>
<b>QUALITY AND NUTRITION</b>	○○	➤	—	<p>Since the beginning of our engagement process, Tesco has developed various partnerships or concepts creating added nutritional value, such as "Magic Breakfast" and "Eat Happy Project" that contribute to children's nutritional education, also "My Fit Lifestyle", intended to help adults adopt better habits.</p>	
<b>ACCESS TO FOOD</b>	○○	▲	●	<p>Tesco is making progress on the subject of access to food. Since 2013, the company has strengthened its dedicated policy by structuring donations and ensuring redistribution that allows access to nutritionally superior products at the best price. The company has also developed its fresh product offering to make it more accessible.</p>	<ul style="list-style-type: none"> <li>➤ Continue developing access to food policy by setting up formalised specific programmes</li> </ul>
<b>REDUCE FOOD WASTE</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○	▲	●	<p>As mentioned in 2013, Tesco has succeeded in identifying the key issues related to food waste and incorporating them into its overall policy by publishing the findings of its studies and the data collated on this theme.</p> <p>Since then, the company has remained well positioned in this respect and is continuing to identify the areas that generate the most waste in the value chain (Hotspots). In response to our recommendation on communicating about the actions undertaken and the progress made by these "Food Waste Hotspots", the company has improved the transparency of its methodology, the actions rolled out across the entire value chain and the results obtained on the scope of products analysed.</p> <p>Tesco would do well to extend these good practices outside the United Kingdom and apply its identification programmes of the areas that generate most waste to a broader scope of products.</p>	<ul style="list-style-type: none"> <li>➤ Extend "Food waste profile of typical Tesco shop" to non-UK markets</li> </ul>
<b>VALUE CHAIN: ANALYSE AND ACTIONS IMPLEMENTED</b>	○○○	➤	○	<p>The company remains very well positioned on this criterion. Tesco fights food waste efficiently by measuring the impact of its actions and leveraging internal and public data. As we noted in our previous report, Tesco's approach stands out in that it maps the waste generated by the 25 products identified as the most sold in stores and the relevant action plans implemented, together with objectives, to limit waste in targeted areas.</p> <p>In recent years, Tesco has continued its structured management of store inventories through targeted initiatives, such as optimising its special offers policy and the management of unsold stock.</p> <p>However, the gains generated by its food waste policy need to be quantified.</p>	<ul style="list-style-type: none"> <li>➤ Quantify gains generated by its strong commitment to fighting waste</li> </ul>

DYNAMIC: ▲ positive ➤ neutral ▼ negative

RECOMMENDATIONS: ● followed ● partially followed recommendations and/or being introduced ○ not followed — no recommendations issued in 2013

\* Definition in glossary

# AHOLD

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
POLICIES & STRATEGIES	○○	➤	—	In 2013, it appeared that the company's good positioning in respect of this criterion was the result of the quality of its nutrition policy, based on the WHO's 2004 report, and its active participation in dedicated working groups. Ahold has since reaffirmed its commitment and succeeding in maintaining a positive momentum. The company has a real desire to improve constantly in this area.	
QUALITY AND NUTRITION	○○	➤	—	As we mentioned in 2013, Ahold puts forward three resolutions as part of the CGF ( <i>Consumer Goods Forum</i> *) and develops several related programmes. These resolutions concern a nutritionally superior offer, transparency and consumer education.  Since our last report, the Group has reaffirmed its ambition and confirmed its objectives (notably increasing the sale of healthy products to at least 25% of total food sales). This is illustrated notably by initiatives for children's nutritional education, which almost doubled between 2011 and 2014.  More recently, Ahold's approach translated into fact by the improvement of several products' nutritional profile to reduce their sugar, fat and salt content.	
ACCESS TO FOOD	○○	➤	○	As we mentioned in 2013, Ahold puts forward three resolutions as part of the CGF ( <i>Consumer Goods Forum</i> *) and develops several related programmes. These resolutions concern a nutritionally superior offer, transparency and consumer education.  Since our last report, the Group has reaffirmed its ambition and confirmed its objectives (notably increasing the sale of healthy products to at least 25% of total food sales). This is illustrated notably by initiatives for children's nutritional education, which almost doubled between 2011 and 2014.  More recently, Ahold's approach translated into fact by the improvement of several products' nutritional profile to reduce their sugar, fat and salt content.	➤ Develop access to company's products by rolling out alternative distribution channels
<b>REDUCE FOOD WASTE</b>					
POLICIES & STRATEGIES	○○	➤	—	The formalisation of the various existing programmes and the development of new initiatives have helped the company to better structure its policy in terms of food waste.  The company is better positioned on this criterion than in 2013. In addition to the waste reduction programmes in its value chain combined with detailed objectives, such as "0% to landfill" out to 2020, already mentioned in our previous report, it has initiated food donation management programmes.	
VALUE CHAIN: ANALYSE AND ACTIONS IMPLEMENTED	○○○	➤	○	Ahold has a strong understanding of risks and opportunities related to food waste.  Ahold has maintained and enhanced the tool implemented in 2012, called "Group Metric", to fight food waste, quantify it as a proportion of sales and identify products that can be donated to food banks. All of this data was published in the company's annual sustainable development report, placing Ahold's reporting (in terms of food waste) above that of the other sector players in terms of transparency. However, the implementation of the Group Metric programme and related reporting should be extended to all of the company's subsidiaries.  As part of the development of programmes designed to reduce food waste, Ahold has defined a clear and efficient four-step process to manage unsold food (discount, donations to food banks, ferments, compost).  In addition, as we had recommended in 2013, the company has structured food donations in the other countries where it is present. Along these lines, the company has recently strengthened its positioning by financing refrigerated trucks and forming contractual partnership agreements with food banks (and local charities).	➤ Educate consumers on best behaviours ➤ Extend application of Group Metric matrix and reporting on analysed data to all subsidiaries.

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed — no recommendations issued in 2013

\* Definition in glossary

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
<b>POLICIES &amp; STRATEGIES</b>				As a reminder, Metro is a distinctive player in the food distribution sector. The company works mainly with professional clients while the market is more retail client-oriented. Metro is therefore less exposed than other sector players to some criteria. In 2013, when we initiated our engagement approach with Metro, the company had not formalised its nutrition policy. Since then, it has made commitments to define the business areas to cover in priority and the action plans to be implemented. Published in May 2015, the company's nutritional policy will be detailed in its next sustainable development report.	<ul style="list-style-type: none"> <li>➤ Continue rolling out nutritional policy and combine it with monitoring indicators</li> </ul>
<b>QUALITY AND NUTRITION</b>				<p>Metro is making progress on this criterion and has started reformulating its products to reduce their sugar, fat and salt content. In addition, in the interests of transparency for consumers, the company has improved its communication concerning products' nutritional characteristics.</p> <p>In parallel, projects to strengthen clients' nutritional education have also been set up by the company and disseminated via different channels. This includes, for instance, awareness programmes on healthy eating habits.</p> <p>Finally, the company focused on improving its range of fresh products to make them more affordable. Internal monitoring of product sales by category enables it to control the impact of these measures on its consumers' nutritional profile.</p>	<ul style="list-style-type: none"> <li>➤ Continue reformulating products to achieve lower sugar, salt and fat content</li> <li>➤ Strengthen reporting on nutritional policy monitoring indicators</li> </ul>
<b>ACCESS TO FOOD</b>				Since 2013, the company has been developing its range of products at affordable prices (in Pakistan, India and China, for instance). For instance, Metro has made the choice to put forward in its shops a number of low cost brands of pasta, rice and other staples.	<ul style="list-style-type: none"> <li>➤ Improve access to more affordable products</li> </ul>
<b>REDUCE FOOD WASTE</b>					
<b>POLICIES &amp; STRATEGIES</b>				Since our last report, Metro has pursued its programme to reduce food waste. This programme notably aims for global optimisation of its supply chain by providing support to its suppliers	<ul style="list-style-type: none"> <li>➤ Formalise reporting and develop impact assessment indicators</li> </ul>
<b>VALUE CHAIN: ANALYSE AND ACTIONS IMPLEMENTED</b>				<p>Under Metro's food waste reduction policy, specific training courses have been implemented to help producers structure and optimise their business. The company has recently established close cooperation with its suppliers in China to limit losses and support their progress towards best practices in this area. However, as was already the case in 2013, the lack of clear reporting prevents precise identification of areas for improvement.</p> <p>Metro's globally good approach to this criterion includes several key measures, for instance reducing prices of products approaching their use-by date, formalising donations to food banks and transforming unsold products into energy.</p> <p>More recently, in the management of food donations, Metro has committed to meeting the new needs related to the refugee crisis in Europe, multiplying distribution channels for unsold food.</p> <p>Between 2013 and 2015, the company does not seem to have identified the steps in the value chain that generate the most food waste. Such an approach would optimise the company's orders from its suppliers and contribute to a significant decrease in food waste.</p>	<ul style="list-style-type: none"> <li>➤ Identify the steps in the value chain that generate the most food waste and implement appropriate measures</li> </ul>

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed no recommendations issued in 2013

\* Definition in glossary

# CARREFOUR

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○○	➤	—	Carrefour has clearly identified nutrition-related issues and put in place a clear and appropriate policy. Already very well positioned on this criterion in 2013, the company has since continued to roll out the various programmes related to its nutrition policy, steered by the company's Quality department. The Carrefour Foundation also carries out a large number of initiatives.	
<b>QUALITY AND NUTRITION</b>	○○	➤	○	<p>The product reformulation process conducted by the Quality teams to reduce the sugar, fat and salt content having reached its objectives, Carrefour now wishes to step up its communication efforts to improve consumers' nutritional education.</p> <p>In 2014, the company therefore introduced a new nutritional signage developed in close cooperation with a panel of experts. The first results will be available in 2015. Introduced in a context where nutritional signage currently lacks consistency, this innovation risks not being followed by the sector and adding to the consumer's confusion.</p> <p>Since our previous exchanges, reporting on the company's nutrition policy has not changed much and remains fairly limited.</p> <p>With regard to exporting healthy eating habits outside France, the company has continued to maintain and monitor the various local projects implemented abroad, such as fighting malnutrition in Argentina.</p> <p>The company would do well to strengthen this approach and export it to the other countries where it is present.</p>	<ul style="list-style-type: none"> <li>➤ Strengthen reporting on nutritional policy monitoring indicators</li> <li>➤ Export and disseminate healthy eating habits outside France</li> </ul>
<b>ACCESS TO FOOD</b>	○○	➤	●	<p>Carrefour's access to food policy focuses on three main areas: food banks (collection and distribution), solidarity grocery stores (France, Argentina, Taiwan, Spain and Brazil) and products developed according to local needs. In this way, as it had done in Brazil in 2013 with high nutritional value rice, the company launched fortified foods responding to local deficiencies in China in 2014.</p> <p>In addition, Carrefour has succeeded in ensuring access to nutritionally superior products to as many people as possible by maintaining a pricing policy adapted to each geographical area.</p> <p>Finally, the company has better structured its food donation policy, notably by harmonising the contracts between each store and one or several charities depending on its size and location.</p>	<ul style="list-style-type: none"> <li>➤ Continue developing access to company's products by rolling out alternative distribution channels</li> </ul>
<b>REDUCE FOOD WASTE</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○	➤	○	<p>Carrefour has been able to maintain a positive momentum with its detailed policy together with objectives and clear progression guidelines related to the reduction of food waste. During the period of our engagement dialogue with the company, between 2012 and 2014, the markdown rate, an indicator monitoring food waste, decreased by 12.4%.</p> <p>Since our last report, the company has continued rolling out its "Anti-gaspi" company-wide plan implemented in 2012 to reduce food waste. Carrefour has notably introduced "anti-gaspi coaches" and several measures such as removing the Best Before date of more than 50 SKUs and extending the shelf life of 300 SKUs. In July 2015, as part of the Consumer Goods Forum, Carrefour set itself a goal of reducing waste and halving food waste between 2016 and 2025.</p> <p>These actions earned Carrefour the "2014 anti-gaspi" prize awarded by the French Ministry of Agriculture and Agri-Food. However, the company would do well to further develop its reporting in terms of food waste, for instance by publishing internal and external indicators on food waste.</p>	<ul style="list-style-type: none"> <li>➤ Formalise waste reporting</li> </ul>
<b>VALUE CHAIN: ANALYSE AND ACTIONS IMPLEMENTED</b>	○○○	➤	●	<p>Carrefour's commitment in terms of food waste is based on monitoring internal and external indicators and rolling out operations in France and abroad.</p> <p>As we noted in 2013, Carrefour relies on a structured donations policy and highlights its work on the definition of relevant KPIs related to food waste through dedicated working groups.</p> <p>In connection with our recommendation to identify the stages of the value chain generating the most food waste, work on mapping waste in the banana production chain has been carried out and will be published shortly. This mapping will be extended to other products, like apples, and some processed products. This made it possible to change the terms of reference of some suppliers in order to limit waste at their level and improve order visibility.</p>	

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed no recommendations issued in 2013

\* Definition in glossary



THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○○	➤	—	“Bring health to the greatest number” – this is Danone’s objective. The company has placed nutrition at the heart of its global strategy, combined with measurable and ambitious engagements that the company publishes in detailed reports.	
<b>QUALITY AND NUTRITION</b>	○○	➤	●	Danone’s product positioning gives it a competitive advantage in terms of nutrition. Its four business lines, fresh dairy products, water, child nutrition and medical nutrition, are by their very nature better positioned and less questioned for their nutritional quality than other product families. The company is also one of the most active in terms of reformulation and integrating high nutritional standards.  Since 2013, the proportion of products complying with the company’s nutritional quality guidelines has increased to 66% of Danone’s sales. The company’s nutrition model combines studies of local markets to adapt products to populations’ needs, the development of alternative, healthier products to guide consumers in their eating habits, as well as measuring their impact on consumers’ diet and health. Ideally, Danone should communicate more on the nutritional standards applied. The company also reports on several examples of improved products and the percentage of improvement by business line.	➤ Increase transparency and strengthen reporting on types of improvements made to products
<b>ACCESS TO FOOD</b>	○○	➤	●	Danone recognises that it has a responsibility to contribute to the good health of the greatest number according to local needs and to work for the well-being of communities, regardless of income levels, economic development or cultural practices. Access to food therefore forms an integral part of Danone’s strategy, notably via specific R&D meeting the constraints of emerging markets (e.g. extending products’ shelf life). Danone also develops alternative distribution channels and works with the public authorities and local players. Danone appears to be continuing to develop population-specific programmes, but it is very difficult to assess progress made in this area because there is no strict formalisation.	➤ Maintain and develop programmes for BoP populations
<b>MARKETING</b>	○○	➤	●	Danone has been involved in defining common nutritional criteria to limit advertising to children as part of the EU Pledge*. For the time being, the company has no plans to fine-tune its policies for children over 12. It acknowledges, however, that discussions are under way in some pledges for 12-18 year olds.  Concerning child nutrition, Danone is guided by the WHO International Code of Marketing of Breast-milk Substitutes and has also implemented its own policies, tools and procedures. Nevertheless, despite the fact that the company discloses cases of non-compliance, some local business practices do not seem very compatible with the strict application of the WHO code.	➤ Fine-tune ethical marketing policies for children over 12
<b>REDUCE FOOD WASTE</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○	➤	●	Although it is undeniably one of the most progressive players in terms of nutritional engagement, Danone’s approach was less advanced and formalised in 2013 concerning food waste.  A materiality analysis carried out in 2014/2015 lists 15 material topics that do not include food waste as a priority.  In 2014, however, Danone acknowledged it had a role to play in mitigating waste and formalised a food waste reduction policy describing the main actions and engagements being implemented in the value chain. Local actions are put in place in certain subsidiaries, often liaising with food banks. These programmes are not yet coordinated or consolidated at the global level.	➤ Formalise and implement action plan or food waste reduction policy across the value chain
<b>VALUE CHAIN: ANALYSE AND ACTIONS IMPLEMENTED</b>	○	➤	●	Progress made on the consideration of the food waste issue should go hand-in-hand with performance indicators reflecting the reduction in waste and the structuring of food donations.	➤ Implement relevant performance indicators to monitor food waste

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed no recommendations issued in 2013

\* Definition in glossary

# MONDELEZ

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
<b>POLICIES &amp; STRATEGIES</b>	◎◎	➤	—	Nutrition is a key issue for the company, which has focused its business strategy on the "Call for Well-being". This is based on four pillars, notably "Mindful Snacking".	
<b>QUALITY AND NUTRITION</b>	◎◎	➤	●	<p>Nutrition is a priority research area for Mondelez, which spends a significant portion of its R&amp;D on it. A team of 2,400 scientists is responsible for this work. The main objective is to offer optimised, healthier products without altering their taste for consumers. Based on WHO standards, Mondelez has set quantified objectives to be met before 2020, including an increase in individual servings of less than 200 calories, a reduction in salt and saturated fat content and an increase in the proportion of Better Choice products. More than 600 nutritionists work on improving the products' nutritional profile and on the Better Choice options, a category of products meeting stricter nutrition criteria compared with existing alternatives. These products must also include a positive nutritional element (e.g. whole grain) or a reduction of a specific nutrient (sodium).</p> <p>The company is making regular progress on the proportion of Better Choice products as well as on increasing the number of single servings. On the other hand, results on the reduction of saturated fat are more mixed for the time being. Mondelez told us, however, that the steps put in place should make it possible to reach the target set for 2020.</p> <p>Regarding transparency, the company has provided back of pack nutrition labelling on all products globally – including single and multiple portion packages - in line with WHO and Codex* standards. The company has made progress on front of pack nutrition labelling providing the number of calories. The company also applies relevant Codex standards to its use of health and nutrition claims in the absence of regulatory guidance. Where the company makes a claim about a nutrient (e.g. 'good source of fiber') or added a nutrient for fortification purposes, the company provides information on that specific nutrient on the label.</p>	
<b>ACCESS TO FOOD</b>	◎	➤	●	Mondelez has identified three major areas to improve access to food: market certified products meeting nutritional needs related to local deficiencies, develop alternative distribution channels and promote local products. The actions implemented are not formalised through quantified objectives or publicly communicated programmes. Nevertheless, Mondelez is committed to reducing the portions of certain products in order to make them more affordable, as is the case for Tiger Biskuat, for example, in the Asia Pacific region.	<ul style="list-style-type: none"> <li>➤ Report on roll-out of actions concerning the three areas outlined by Mondelez</li> <li>➤ Clarify pricing positioning</li> </ul>
<b>MARKETING</b>	◎◎	➤	●	<p>Responsible marketing is integrated in the code of conduct and internal compliance policies.</p> <p>The company stands out with a responsible marketing policy that applies to secondary schools and not just primary schools.</p> <p>At this point, Mondelez has no plans to extend its responsible marketing policy to children over 12.</p>	<ul style="list-style-type: none"> <li>➤ Fine-tune ethical marketing policies for children over 12</li> </ul>
<b>REDUCE FOOD WASTE</b>					
<b>POLICIES &amp; STRATEGIES</b>	◎	➤	●	<p>Food waste management forms an integral part of the overall waste reduction programme at company level.</p> <p>Mondelez is committed to reducing total manufacturing waste by 20% by 2020 (vs 2013) and fighting food waste, upstream via sustainable agriculture programmes and downstream by optimising packaging and portions. The progress made is difficult to measure, however, as the objectives focus on waste in general and not on food waste specifically.</p>	<ul style="list-style-type: none"> <li>➤ Specify engagements on value chain optimisation so as to reduce food waste</li> </ul>
<b>VALUE CHAIN: ANALYSES AND ACTIONS IMPLEMENTED</b>	◎	➤	●	<p>The company has not made any specific measurable progress but has continued to work on its direct waste production (which therefore includes food waste).</p> <p>The strategy still lacks a formal structure for food donations, even though the company encourages donations, notably of surplus stocks.</p>	<ul style="list-style-type: none"> <li>➤ Implement programmes to reduce waste across the value chain</li> </ul>

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed no recommendations issued in 2013

\* Definition in glossary

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
POLICIES & STRATEGIES	○○○	➤	—	Unilever is continuing to roll out its "Unilever Sustainable Living Plan" policy for 2020. In practice, the company is notably committed to improving nutrition and reducing its environmental footprint.	
QUALITY AND NUTRITION	○○	➤	●	Even though all the latest results will only be communicated in a few months, Unilever's detailed 2014 reporting reflects the progress made in many nutritional areas. The company has notably made good progress on the proportion of products meeting the highest nutritional standards (33% in 2014 with a target of 60% by 2020). Significant progress has also been made on reducing levels of sugar, salt and saturated fat. In addition, more recently, some objectives associated with specific product families such as ice-cream for children have been met. Unilever has also made significant progress on "ready to drink" beverages.  Nutrition information is gradually being supplemented on the packaging of all products sold in Europe and North America. Unilever is gradually extending nutritional labelling to other commercial regions so as to cover all products.	➤ Increase proportion of portfolio meeting the highest nutritional standards and report on this
ACCESS TO FOOD	○○	➤	●	Unilever takes the issue of access to food very seriously. The company performs studies to better understand local issues and improve product accessibility. Depending on the local context, Unilever works with local authorities in order to integrate fortified properties meeting local needs, notably zinc, vitamin A, iron and some of the B vitamins. These partnerships will need to be developed in the years ahead as this is a new business model focusing on very low-income populations. From our point of view, however, it is still complicated to understand the programmes implemented and the reporting tools relating thereto.	➤ Strengthen reporting on actions initiated by the company to improve access to its healthy and fortified products for disadvantaged populations
MARKETING	○○	➤	○	Although the marketing and advertising principles were reviewed in 2014 and responsible marketing practices are in line with the most demanding standards, Unilever does not want to change its marketing strategy for children over 12 for the time being. The company prefers to focus its efforts on homogenising responsible marketing practices throughout its markets worldwide.	➤ Fine-tune responsible marketing policy by limiting advertising campaigns in secondary schools and fine-tuning marketing campaigns for children over 12
<b>REDUCE FOOD WASTE</b>					
POLICIES & STRATEGIES	○○	➤	—	Unilever is maintaining the same strategic direction in terms of reducing food waste. The company relies on strategic partnerships and the identification of best practices as well as broader objectives for waste reduction, for example.	
VALUE CHAIN: ANALYSES AND ACTIONS IMPLEMENTED	○○○	➤	●	Unilever analyses and measures the level of food waste across its value chain and carries out studies on each risky segment of the supply chain.  A first pilot project should serve as a reference for developing an approach on several other commodities. Concerning product redistribution, the company has established several partnerships with food banks to assist the poorest people and also reduce its waste.	➤ Extend pilot model to other products and report on the corrective measures applied

DYNAMIC: positive neutral negative

RECOMMENDATIONS: followed partially followed recommendations and/or being introduced not followed no recommendations issued in 2013

\* Definition in glossary

# NESTLE

THEMES	LEVEL (1 TO 3)	DYNAMIC	STATUS (OF RECOMMENDATIONS)	ANALYSIS	RECOMMENDATION(S) RENEWED OR NEW
<b>MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○○	➤	—	Nestlé's approach is in keeping with the nutritional issues to which food companies must respond. Nutrition is an integral part of the development areas that the company sees as issues fundamental to both its growth and its consumers. In 2014, the company had listed 15 engagements in the "Nutrition" category, in line with its ambition of being the global leader in nutrition, health and well-being.	
<b>QUALITY AND NUTRITION</b>	○○	➤	●	<p>The company relies on product reformulation and R&amp;D to improve its products' profile in order to meet the strictest nutritional standards through a number of engagements: child nutrition, reducing sugar, salt and fat content, as well as promoting and providing guidelines for better balanced and healthier products. In 2014, Nestlé reformulated 10,000 products for nutrition or health considerations. The company is also continuing to adapt its products to local needs and deficiencies. In 2014, the actions implemented notably included improving products intended for children based on the Nestlé Nutritional Foundation, which applies the recommendations of the WHO and the Institute of Medicine.</p> <p>The company makes regular progress on nutrition and obtains satisfactory results. For example, almost 98% of children's products meet the company's standards for sugar, salt and fat content. In addition, all of the nutritional claims are subjected to scientific and clinical controls before the products are put on the market.</p>	<ul style="list-style-type: none"> <li>➤ Continue product reformulation programmes so as to increase the proportion of products with optimised nutritional profiles in the portfolio and develop nutritional control processes (increase the number of external controls)</li> </ul>
<b>ACCESS TO FOOD</b>	○○	➤	●	With its Popularly Positioned Products (PPPs, 13% of sales), the company aims to propose "high-quality food products that provide nutritional value at an affordable cost for lower-income consumers". Nestlé also wants to help reduce the risk of undernutrition by fortifying products with micronutrients. The company is gradually increasing the number of portions of fortified products worldwide (183 billion in 2014 for a target of 200 billion in 2016). The company engages in research and studies to measure the impact of micronutrient fortification. For example: iron-fortified bouillon cubes in Africa, and fortified children's products in the Philippines. In 2014, the company extended its efforts to products intended for children and women of childbearing age. Despite all this, Nestlé still provides too little information on the development of innovative and alternative concepts for access to food.	<ul style="list-style-type: none"> <li>➤ Increase programmes aimed at making Nestlé's healthiest products accessible to as many people as possible</li> <li>➤ Communicate more on impact of fortified products</li> </ul>
<b>MARKETING</b>	○○	➤	○	The company has undertaken not to conduct marketing campaigns targeting children aged under 6 and to focus advertising campaigns for 6-12 year olds on products with a nutritional profile enabling a healthy and well-balanced diet, with limited sugar, salt and fat content. The responsible marketing policy was strengthened in 2015 with the introduction of stricter nutritional criteria for 6-12 year olds. The company undertakes to respect national pledges and the EU Pledge. That said, Nestlé does not go beyond the pledges, notably in terms of restricting marketing practices for children aged over 12.	<ul style="list-style-type: none"> <li>➤ Fine-tune ethical marketing policies for children over 12</li> </ul>
<b>REDUCE FOOD WASTE</b>					
<b>POLICIES &amp; STRATEGIES</b>	○○	➤	●	<p>In 2013, the company dealt with the issue at local level and the company disclosed little on the subject. In 2015, Nestlé has formalised its global anti-waste policy by launching the "Nestlé Commitment to reduce food loss and waste". This public commitment guides the company in its efforts against waste. Nestlé is committed to focusing on: preventing, minimising and recovering waste, heightening awareness, training employees and consumers, contributing to multi-stakeholder initiatives and, lastly, reporting on the subject. This commitment includes the goal to achieve zero waste for disposal by 2020. It would also be interesting to define/set quantitative targets on food waste specifically</p> <p>The CEO Paul Bulcke has underlined the company's commitment to reducing food loss and waste by joining Champions 12.3, which will work to inspire action on this issue. He publicly announced this new coalition at Davos on the 21st of January 2016.</p>	<ul style="list-style-type: none"> <li>➤ Set quantitative criteria</li> </ul>
<b>VALUE CHAIN: ANALYSES AND ACTIONS IMPLEMENTED</b>	○	➤	●	<p>Implementation in 2013 of the "Nestlé Zero Food Wastage Task Force", which defines, frames and updates a programme covering the entire value chain. This working group also aims to guide multi-stakeholder initiatives such as the CGF (Consumer Goods Forum) resolution on food waste issued in June 2015 and the development of the food loss and waste Protocol led by the WRI (World Resources Institute) to be issued in April 2016.</p> <p>Even though the company communicates about some examples of training farmers to fight waste or recycling coffee grounds into energy, it would help to set up a more formal impact measurement in order to reflect the progress made. So far, Nestlé monitor the environmental performance (including waste) at site level on a monthly.</p> <p>In 2013, Nestlé met already our 2015 target to achieve zero waste in 10% of Nestlé factories, in fact two years early. By the end of 2014, the group reduced waste for disposal per tonne of product by almost 70% since 2004. On Earth day, 22nd of April 2015, Nestlé USA announced that all their 23 factories achieved zero waste to landfill.</p>	<ul style="list-style-type: none"> <li>➤ Measure impact of actions and progress achieved and report on this</li> </ul>

## Summary table of 2015 analyses (new ratings)

### ■ Access to food and the fight against food waste in the food and retail sectors

	MALNUTRITION, UNDERNUTRITION AND IMPROVEMENT IN PRODUCTS' NUTRITIONAL QUALITY								REDUCE FOOD WASTE			
	POLICIES & STRATEGIES		QUALITY & NUTRITION		ACCESS TO FOOD		MARKETING		POLICIES & STRATEGIES		VALUE CHAIN: ANALYSES AND ACTIONS IMPLEMENTED	
	2015	Trend	2015	Trend	2015	Trend	2015	Trend	2015	Trend	2015	Trend
<b>FOOD RETAIL</b>												
AHOLD	○○	➤	○○	➤	○○	↖	-	-	○○	➤	○○○	↖
CARREFOUR	○○○	➤	○○	➤	○○	➤	-	-	○○	➤	○○○	↖
CASINO	○○	➤	○○	➤	○○○	↖	-	-	○○	➤	○○	➤
METRO	○	➤	○○	↖	○	➤	-	-	○○	➤	○○	➤
TESCO	○○	➤	○○	➤	○○	↖	-	-	○○	➤	○○○	➤
<b>FOOD</b>												
DANONE	○○○	➤	○○	➤	○○	➤	○○	➤	○○	↖	○	➤
MONDELEZ	○○	➤	○○	➤	○	➤	○○	↖	○	➤	○	➤
NESTLE	○○○	➤	○○	➤	○○	➤	○○	➤	○○	↖	○	➤
UNILEVER	○○○	➤	○○	➤	○○	➤	○○	➤	○○	-	○○○	↖

■ Respect for human rights in the mining and oil sectors

	RESPECT FOR HUMAN RIGHTS IN THE MINING AND OIL SECTORS		SUPPLY CHAIN		SECURITY FORCES		STAKEHOLDER COMPLAINTS MECHANISM		PERFORMANCE INDICATORS & AUDITS	
	2015	Trend	2015	Trend	2015	Trend	2015	Trend	2015	Trend
ANGLOAMERICAN	○○○	↖	○○	➤	○○	➤	○○	➤	○○	➤
ARCELORMITTAL	○○	➤	○○	➤	○	➤	○○	➤	○○	➤
BG	○○○	➤	○○○	➤	○○○	↖	○○	➤	○	➤
BP	○	➤	○○○	↖	○○○	➤	○○	↖	○	➤
ENI	○○○	↖	○○○	➤	○	➤	○○	➤	○○○	➤
OMV	○○	➤	○○	➤	○	➤	○	➤	○	➤
PETROBRAS	○	➤	○○	➤	○	➤	○○	➤	○○	➤
SHELL	○○	➤	○○○	➤	○○	➤	○○○	↖	○○	➤
STATOIL	○○○	↖	○○	➤	○○○	➤	○○○	➤	○○	➤
TOTAL	○○○	↖	○○○	↖	○○	➤	○○○	➤	○	➤

## Responsible & Compliant sourcing of minerals from conflict zones

### Overview of theme

#### ■ Context

For decades, the African Great Lakes region has been infamous for the atrocities that have taken place there and for recurring armed conflict. NGOs estimate that between 1980 and 2000, these conflicts cost the lives of more than 100,000 civilian victims every year. The total number of victims is over 5 million, armed forces and civilians combined.

Today, armed groups are still fighting over territory and on religious and ethnic grounds. These tensions are particularly apparent in the Kivu region, between the Democratic Republic of Congo (DRC) and its neighboring countries (Uganda, Rwanda, Burundi and Tanzania).

In order to get funding, these armed bands levy illegal taxes on minerals (notably gold, tungsten, tantalum and tin) extracted from artisanal mines in the African Great Lakes region. The exploitation by these militias of the DRC's mineral wealth contributes directly to the proliferation and entrenchment of violence and to multiple human rights violations in this territory. *Conflict minerals*\* trade enables armed bands to secure funding in the amount of tens of millions of dollars every year.

In concrete terms, the main impacts concern:

- Human rights: extreme working conditions, child labor, violence, armed conflict.
- Environment and ecology: mineral extraction with no consideration for the environment, effluents discharged without any treatment, plundering of resources.
- Economic development: the region's growth is hampered by the diversion of mineral resources.

Illicit trafficking, smuggling and racketing of all kinds are perpetrated on a huge scale. Some NGOs (notably *Enough Project*\*) mention amounts ranging from \$150m to \$250m, plus around \$250m for the Rwandese militia over the period from 1998 to 2000 alone.

#### ■ Sector reviewed: Electronics

Although the regulations defined in section 1502 of the *Dodd-Frank Act*\* concern a large number of industries, some sectors are more closely concerned. This is notably the case for automotive, electronics, luxury and electronics. Furthermore, the restricted scope of the Dodd-Frank is expected to be expanded by the future European legislation.

In order to better assess the quality of risk management, suggest sources of improvement and issue recommendations, we initiated an engagement policy covering this issue. We decided to focus on the electronics sector for several reasons:

- It is highly exposed given its significant dependency on these minerals: tin is broadly used for welding and alloys (1% to 2% of the total weight of laptops and smartphones), while two-thirds of the tantalum extracted globally is used for the capacitors used in electronics.
- The great variety of players (in terms of country, size and activity) and the disparity between them in terms of progress made in this area. While some companies seem to be lagging with regard to conflict minerals, others stand out by their good practices, showing that it is possible to certify some conflict-free products even in a sector where it is difficult to have a thorough control of the supply chain.
- The heavy impact on the sector of the US legislation and the imminent adoption of similar regulations in Europe, which will soon trigger obligations for European companies.

\* Definition in glossary

> Compliance of minerals from conflict zones

**Trend and major areas for improvement**

In the course of our analysis, we noted that issues related to managing the conflict mineral risk were taken into account by most companies in the electronics sector, with a small number of players lagging somewhat.

Given its strong dependence on conflict minerals, the electronics sector had to develop traceability processes for its supply chain at a very early stage. Sector initiatives such as the *Electronic Industry Citizenship Coalition (EICC)\** and the *Global Sustainability Initiative (GeSI)\** helped increase the number and quality of audits of the smelters related to these four minerals.

Given increasing regulatory and public pressure on the players in this sector, some of which have particularly strong brand visibility, the transparency of the supply chain has recently made significant progress, which should lead to the dissemination of best practices within the sector.

However, some points remain to be improved by implementing the following measures:

- Policy & Strategy: check that suppliers' engagements comply with *EICC\** Code of Conduct.
- Traceability: implementation of a policy associated with clear action and improvement plans; transparency of communication on systematic compliance control of suppliers;
- Control, monitoring, certification: implementation of a more systematic approach with suppliers; financing of smelter control and certification inspections to contribute to the development of a secure and high-quality database; implementation of direct or indirect certification audits and site visits; putting in place the means necessary to achieve the engagements announced.
- Engagement and results: implementation of quantified objectives to achieve certified "conflict-free" smelters; participation in sector initiatives.

**Summary table of 2014 ratings**

■ Responsible & Compliant sourcing of minerals from conflict zones

	ALCATEL	INTEL	COMPANY A	COMPANY B	COMPANY C
POLICIES AND STRATEGIES	⊙⊙	⊙⊙	⊙⊙	⊙	⊙⊙
TRACEABILITY	⊙⊙	⊙⊙⊙	⊙⊙	⊙	⊙
CONTROL, MONITORING, CERTIFICATION	⊙	⊙⊙⊙	⊙⊙	⊙	⊙⊙
ENGAGEMENT AND RESULTS	⊙	⊙⊙	⊙	⊙	⊙

\* Definition in glossary



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## Changes in corporate practices since previous analysis

As we emphasised in 2014, the issues related to responsible supply of minerals in conflict zones seem to be well taken into account by companies through their specific policies. They focus on monitoring and supporting suppliers through training and corrective action plans.

In terms of traceability, even if some less advanced companies have not reported any significant developments this year, others have reaffirmed their good positioning in terms of transparency and of identifying minerals' country of origin. Supplier monitoring has been strengthened, with

particular attention paid to their specific policies and a requirement for responsible sourcing for the most easily traceable minerals, such as tantalum.

Regarding engagements and results, the various players we met continued to strengthen supplier monitoring and now have more formalised and detailed policies. There is still significant room for improvement, however, in terms of certification and communication of the results collected from suppliers.

Detailed fact sheets

# ALCATEL-LUCENT

RECOMMENDATIONS 2014	CHANGES 2015
<p><b>POLICIES &amp; STRATEGIES</b></p> <ul style="list-style-type: none"> <li>&gt; Check that suppliers' engagements comply with EICC Code of Conduct.</li> </ul>	<p>Alcatel-Lucent has implemented a formal tracking of supplier commitments. Suppliers refusing to sign are typically large and well-recognised US companies that have a thorough conflict minerals programme and are evaluated by Alcatel-Lucent during the data collection and check process, but refuse to sign any commitment as a matter of principle.</p> <p>The company published an updated conflict minerals policy in October 2015, which clarifies the group's expectations for Tantalum.</p>
<p><b>TRACEABILITY</b></p> <ul style="list-style-type: none"> <li>&gt; Heighten suppliers' awareness of this issue to encourage them to be more involved</li> </ul>	<p>In 2014 and 2015, Alcatel-Lucent made an early communication to suppliers to ensure they would get well prepared for when the company would collect data during the last quarter of the year. The communication includes guidelines and high level information on conflict minerals to enable suppliers to fine-tune their approach and objectives.</p> <p>In 2014, Alcatel-Lucent surveyed 303 suppliers covering 90% of its expenditure and had an 88% response rate from suppliers.</p>
<p><b>CONTROL, MONITORING, CERTIFICATION</b></p> <ul style="list-style-type: none"> <li>&gt; Specify origin of minerals so as to conduct, directly or indirectly, audits, certifications and site visits.</li> </ul>	<p>Company's 2014 conflict minerals report identifies the smelters the company sources from and the associated countries of origin of the minerals.</p> <p>Alcatel-Lucent is a member of <i>CFSI</i>*, whose key focus is to audit smelters on-site on their traceability practices to determine whether they are <i>conflict-free</i>*</p>
<p><b>ENGAGEMENT AND RESULTS</b></p> <ul style="list-style-type: none"> <li>&gt; Implement the resources needed to meet these commitments</li> </ul>	<p>In 2015, the number of suppliers surveyed increased significantly.</p> <p>Moreover, the company has significantly tightened the controls on supplier reports, including a qualitative review of their conflict minerals policies, to increase the push for improvement.</p>

\* Definition in glossary

## COMPANY A

RECOMMENDATIONS 2014	CHANGES 2015
<p><b>POLICIES &amp; STRATEGIES</b></p> <ul style="list-style-type: none"> <li>Provide more training on conflict minerals for subcontractors and suppliers and increase Company A's participation in sector initiatives.</li> </ul>	<p>The company has maintained its commitments toward its suppliers by organising webinars and one-on-one sessions with suppliers that needed help. All of the suppliers were provided with detailed feedback on their progress and where necessary asked to put corrective actions in place, which were then monitored through the year.</p>
<p><b>TRACEABILITY</b></p> <ul style="list-style-type: none"> <li>Encourage suppliers to adopt specific policy on conflict minerals and create strong incentives to make them purchase only from certified sources.</li> </ul>	<p>Company A insists that all the relevant suppliers have a Conflict Minerals Policy and included this in the KPIs tracked. As of June 2015, 99% of its suppliers had a Conflict Minerals Policy in place. Company A also asked suppliers to focus on getting 100% of smelters mapped in their respective supply chains, to engage with smelters on Conflict-Free Smelter Program audits and to purchase conflict-free validated tantalum only.</p>
<p><b>CONTROL, MONITORING, CERTIFICATION</b></p> <ul style="list-style-type: none"> <li>Fund and participate in smelter control and certification projects so as to contribute to the development of a reliable database.</li> </ul>	<p>The company participates in smelter control and certification projects indirectly through its engagement in <i>Conflict-Free Sourcing Initiative*</i>, and <i>Smelter Engagement Team*</i>, helping to motivate and prepare smelters to go through third party audits.</p>
<p><b>ENGAGEMENT AND RESULTS</b></p> <ul style="list-style-type: none"> <li>Set quantified objectives to achieve conflict-free certification of its smelters</li> </ul>	<p>Company A has updated its conflict minerals strategy and set clear targets. Progress on main KPIs was also reported in the Conflict Minerals report.</p>

\* Definition in glossary

## COMPANY B

RECOMMENDATIONS 2014	CHANGES 2015								
<p><b>POLICIES &amp; STRATEGIES</b></p> <ul style="list-style-type: none"> <li>➤ Set up a more transparent policy on conflict minerals and a clear plan for action and improvement.</li> <li>➤ Communicate more on systematic compliance control of its suppliers.</li> </ul>	<p>During the year, Company B published a specific statement on Conflict Minerals and increased the education of its suppliers.</p> <p>Transparency has improved as the company has published the name of smelters found in its supply chain, and tables showing the number of "Conflict Free*" smelters in its supply chain:</p> <p>Number of smelters or refiners in Company B's supply chain verified as conflict-free or in the audit process:</p> <table border="0"> <tr> <td>Tantalum</td> <td>100%</td> </tr> <tr> <td>Tin</td> <td>79%</td> </tr> <tr> <td>Tungsten</td> <td>78%</td> </tr> <tr> <td>Gold</td> <td>64%</td> </tr> </table>	Tantalum	100%	Tin	79%	Tungsten	78%	Gold	64%
Tantalum	100%								
Tin	79%								
Tungsten	78%								
Gold	64%								
<p><b>TRACEABILITY</b></p> <ul style="list-style-type: none"> <li>➤ Increase number of smelter visits so as to improve knowledge of supply chain.</li> <li>➤ Encourage suppliers to adopt specific policy and create strong incentives to make them purchase only from certified sources.</li> </ul>	<p>Company B does not perform smelter audits on its own but supports joint industry initiatives, and is a member of the <i>Conflict Free Smelter Initiative</i>*. Hence, the company sponsors the <i>Conflict Free Smelter Program</i>*.</p>								
<p><b>CONTROL, MONITORING, CERTIFICATION</b></p> <ul style="list-style-type: none"> <li>➤ Adopt a more systematic approach, better perceived by suppliers, to benefit from the legislation on conflict minerals so as to improve knowledge of its supply chain.</li> </ul>	<p>The systematic work on compliance control is incorporated in the company's 'beyond monitoring' approach which develops the relationship with suppliers across three phases: 'require', 'assess' and 'improve'.</p> <ul style="list-style-type: none"> <li>➤ First, the company provides suppliers with clear sustainability and CR requirements.</li> <li>➤ Second, Company B assesses suppliers' sustainability performance through monitoring and audits. This includes identifying and auditing high-risk suppliers.</li> <li>➤ Third, to ensure continuous improvement, the company engages with suppliers through audit follow-up, Code of Conduct seminars, training sessions, and web-based learning. Suppliers must comply with the requirements of the Company B Code of Conduct which are included in supplier contracts.</li> </ul>								
<p><b>ENGAGEMENT AND RESULTS</b></p> <ul style="list-style-type: none"> <li>➤ Rely to a greater extent on sector initiatives and methods of other sector players</li> </ul>	<p>In the company's contractual agreements with suppliers, it requires that all its suppliers establish due diligence processes consistent with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*" . Suppliers are also requested to use <i>conflict-free</i>* smelters whenever possible.</p>								

\* Definition in glossary

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## Lobbying by pharmaceutical companies and the automotive industry

### Theme overview

#### ■ Context

In theory, the exercise by organisations of their right to express their position and defend their interests (lobbying, influence activity, advocacy) has its rightful place in the public debate and makes a useful contribution to democratic life. However, the currently still limited number of lobbyists registered on the various existing registers in France and Europe corroborates the fact that lobbying is certainly a fundamental theme, but that there is clearly room for improvement (for example, in France, the register set in place in January 2015 at the National Assembly only lists around 40 private firms and 20 consulting firms). Furthermore, even if there is no global normative consensus to date, these activities are being structured from year to year.

Responsible lobbying is possible and several issues appear as key to achieving this:

- **Transparency:** The idea is to show how companies report to their stakeholders (including shareholders) on the exercise of their influence (interests defended, resources allocated, control mechanisms). A soundly structured framework associated with sincere and comprehensive transparency significantly reduces exposure to different types of risks (regulatory, legislative, corruption, reputation, etc.).
- **Coherence:** Check that commitments made in terms of lobbying on the one hand, and societal engagements outlined in companies' CSR policies on the other hand, are consistent and that there is no contradiction. The practice of responsible lobbying represents a powerful mode of action available to companies. It is therefore essential to ensure that this lever is used consistent with their interests and their commitments to advance the economic and political agenda towards a more sustainable society.

#### ■ Sectors reviewed

##### ● Pharmaceutical Industry

At the point of convergence between public health and private interests, ethical issues take on a particular dimension when it comes to the pharmaceutical sector. The influence, real or alleged, of the pharmaceutical industry on our leaders and physicians regularly makes headlines, reflecting the lingering mistrust of a large proportion of citizens vis-à-vis the healthcare industry.

And yet, the exercise of influence is not in itself an issue. It is even quite legitimate for a laboratory to maintain a continuous

dialogue with its stakeholders – physicians, patients, the scientific community, health authorities – or that it should seek to monitor, anticipate and guide decisions that will determine the regulatory environment in which it will evolve. It is in fact the responsibility of pharmaceutical companies (vis-à-vis society and their shareholders) to maintain relations with each group, understand their expectations and assert the company's interests in striving to find common ground. Through transparent and balanced dialogue with its stakeholders, the company helps protect and create lasting value.

But the reality is that we are far from this ideal. Why? First, and this is not unique to the pharmaceutical industry, because the forces are unequal: the industry's access to decision-makers and financial resources, however legitimate, appear disproportionate in relation to other stakeholders. Second, because a number of controversies have eroded the confidence of civil society in the possibility of an ethical relationship between the pharmaceutical industry and its stakeholders. The practice of "pantouflage" (a practice by which high-level French civil servants obtain work in private enterprises), or the revolving door between the industry and health authorities, which reached caricatural heights in the case of Mediator, increased doubts on the existence of conflicts of interest. The support given by several laboratories to the conservative think-tank ALEC<sup>1</sup> has also highlighted the lack of coherence between CSR objectives and public relations policies. Finally, the considerable fines paid by leading laboratories for off-label promotion practices in the United States or insufficient information on drug side effects show that there is still some way to go to implement a transparent and balanced relationship with physicians and the scientific community.

##### ● Automotive industry

Car manufacturers are facing several challenges, primarily the reduction of their vehicles' CO<sub>2</sub> emissions but also the improvement of the safety of their fleet, the development of driverless cars and connectivity, etc. With regard to CO<sub>2</sub> emissions, in Europe and in other countries (United States, China, Japan, South Korea), the authorities have introduced regulations laying down thresholds to achieve in the years to come. The European Union has notably imposed new emission limits which will apply from 2015 and other, stricter limits that will take effect in 2020. Car manufacturers incur financial penalties if they fail to comply with the thresholds.

To achieve the objectives set by regulators, carmakers are faced with a strong challenge that has led them to invest in R&D to create new technologies. The pressure is high because

<sup>1</sup> The American Legislative Exchange Council (ALEC) is a US lobbying network of Republican politicians, whose positions are sometimes controversial (in particular on the right to self-defence). Many companies severed ties with ALEC after their support was published in the press.

> Lobbying by pharmaceutical companies and the automotive industry

the necessary investments are expensive. Furthermore, the development of certain alternative vehicle solutions is hampered by significant constraints. Electric vehicles are a case in point: limited mileage autonomy, small network of charging stations, etc. In this context, carmakers use their influence on public decision-makers fairly widely to defend their interests, which may differ strongly depending on their own situation.

### Trend and major areas for improvement

To monitor lobbying practices, Amundi has selected four criteria to compare the positioning of companies in terms of influence on public authorities:

- **Policy & Strategy:** formalization of corporate engagements, registration in lobbying registers.
- **Transparency:** communication on public positions defended, participation in external associations/organizations for lobbying purposes, budgets for internal/external lobbying activities.
- **Organization:** operation of lobbying activities at central and local level, breakdown of responsibility levels of the persons or committees concerned.
- **Control staff training** program, whistleblowing system, internal and external audits, dialogue with stakeholders inside the company.

With regard to the pharmaceutical industry, the choice was made to complete the analysis of influence practices on public authorities by the analysis of two sector-specific criteria:

- Influence on civil society (professionals and patient groups).
- Influence on clinical research.

For the automotive industry, as the major issue clearly concerns relations with the public authorities, it did not appear relevant to integrate specific criteria supplementing our analysis.

#### ● **Pharmaceutical companies**

The companies we met were aware of this crisis of confidence and most of them are working on framing their practices, not only to manage the legal risk, but also because the professionals in charge of these influence strategies realise that responsible lobbying is in their interest long term (clarity, trust). We are therefore seeing the emergence of a number of good practices that we have analysed with regard to three main criteria:

transparency, consistency and control. A few companies have drafted voluntary responsible lobbying charters, validated by the executives, increasing transparency on lobbying spending but also on the positions defended by the firm on key issues. Some laboratories also stand out by being proactive in terms of transparency on clinical trial data, spontaneously publishing the results of trials, both past and present, regardless of the results. Finally, the relationship with physicians is becoming more transparent, as is the relation with patient associations.

As one can see, the field of responsible lobbying is still in the process of structuring itself. The dialogue that we initiated with a few sector players therefore proved not only possible (despite the sensitive nature of the topic) but also timely. Following this exercise, we are convinced that responsible lobbying is both possible and necessary.

#### ● **Automotive industry**

Although their communication is fairly limited, most companies are committed to ensuring the transparency and integrity of lobbying practices.

Companies do not always communicate sufficiently on their positions with regard to the various issues. The subjects discussed with the public authorities are mentioned but without providing details on the company's position and its arguments. Some companies nevertheless have good practices: Daimler, for example, publishes an annual brochure detailing its positions, notably on the reduction of CO<sub>2</sub> emissions, alternative technologies, mobility and other economic themes. This brochure alternates every other year with a focus on cars or on commercial vehicles.

As regards the budgets devoted to lobbying activities, most of the companies surveyed are not very transparent in their annual publications. Some of them do not publish any information on the subject. Other companies disclose the amount of their budget linked to their registrations, but in the majority of cases, there is no information on internal expenditure. A few companies, mostly non-European, disclose global amounts of lobbying budgets, but without details on their breakdown between internal and external spending. In terms of organisation, companies typically have a Public (or External) Affairs Department or Division responsible for coordinating national lobbying activities with those carried out abroad. Daimler, Volkswagen and PSA have adopted this operating structure.

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In most cases, lobbying topics are overseen by top management and discussed at the meetings of the Board of Directors, which has a decision-making role in this area. One of the companies interviewed in our study has set up a special Public Affairs Committee at which the public subjects to be defended are presented to the management, and it held more than a dozen meetings in 2013. Generally speaking, lobbying activities are controlled by the internal audit department, but are not necessarily the subject of a specific and regular audit. Corporate communication could be improved by the disclosure of the means implemented to check the consistency of lobbying activities between the various operational entities. Some companies have set up a committee bringing together the various public affairs officials of the group worldwide to ensure sharing of information, reporting and consistency of the positions held.

Corporate communication could be strengthened on the systems that ensure consistency between the public positions defended and their CSR commitments. Among good practices, some companies organise regular meetings between the CSR department and the Public Affairs department. At Daimler, two committees (one at management level, the other at operational level), oversee consistency between the lobbying positions and the CSR commitments.

In the future, lobbying activities will in all likelihood become better structured and move towards greater transparency.

### Changes in corporate practices since previous analysis:

In the automotive sector, the lobbying practices of most of the companies surveyed in 2014 have changed little overall. Nevertheless, some companies have progressed towards greater transparency. A case in point is PSA Peugeot Citroën, which has improved reporting on lobbying budgets. PSA also communicates clearly on its lobbying positions in respect of each of the CSR issues. Although Volkswagen introduced the principles and guidelines of the “Global Government Affairs” department in charge of lobbying in its 2014 sustainable development report, the group’s communication on its public positions and related arguments remains limited.

In the pharmaceuticals sector, progress is also mixed. GSK is the most active in this area. This group, in line with the recommendations we made in our 2014 engagement report, has formalised its approach by issuing a policy on its public statements. GSK ranked highly in Transparency International’s “Corporate Political Engagement Index 2015” report. The relative positioning of the other companies in our panel remained stable.

This 2016 report ends our work on lobbying. To sum up, we observed several salient points. First, this is a sensitive topic that one can address in certain sectors (pharmaceutical industry), and far less in others (insurance and the automotive industry). Some companies even deny the fact that they use lobbying, reflecting the tension surrounding this practice. Finally, we note that corporate engagement for responsible lobbying is very mixed: some groups, within the same sector, have an open, transparent stance, while others are far more discreet. We hope that our dialogue will have put the topic of responsible lobbying on the agenda of CSR issues. We feel it is important to dispel fanciful notions, avoid inconsistencies and prevent abuses, supervise practices and show transparency.





## EXCLUSIONS

### As a reminder, exclusions concern:

- Companies that violate one or several principles of the Global Compact repeatedly, without implementing suitable corrective measures.
- Companies involved in the production or sale of anti-personnel mines and cluster bombs (exclusions resulting from France's ratification of the Ottawa and Oslo treaties) as well as chemical, biological and depleted uranium weapons.
- Countries that systematically and willfully violate human rights and make themselves guilty of the worst crimes: war crimes and crimes against humanity. These are countries that intentionally and systematically commit the worst of crimes.

Issuers are identified through a monitoring system that gives analysts access to targeted media sources on specific extra-financial subjects. The seriousness of controversy is determined by analysing:

- The gravity of human or environmental damage.
- The repetitive nature of the controversy.

Specific heed is paid to analysing the credibility of information sources.

Dialogue is therefore aimed at putting an end to the most controversial corporate practices.

Dialogue is considered as productive if:

- The company proves its determination to make a commitment.
- It implements corrective measures.
- It sets up adequate means to obtain lasting results.
- It has its approach certified by an independent third party.

Dialogue is considered as unproductive if:

- The company makes no response.
- The company carries on the controversial activity.
- Amundi concludes it has no influence on the company.

In this case, the engagement policy can result in an exclusion of the stocks (normative exclusion policy).

### The tables below provide details on the exclusions made by Amundi:

	CONTROVERSIAL WEAPONS	COMPANIES VIOLATING ONE OR SEVERAL OF THE GLOBAL COMPACT PRINCIPLES	COUNTRIES SYSTEMATICALLY VIOLATING ONE OR SEVERAL OF THE GLOBAL COMPACT PRINCIPLES
NUMBER OF CASES IDENTIFIED	78	9	4
NUMBER OF ISSUERS CONCERNED	106	33	4

### Detail of companies excluded for having violated one or several principles of the Global Compact:

CASES IDENTIFIED	NUMBER OF COMPANIES EXCLUDED	SECTOR	GLOBAL COMPACT PRINCIPLES* INVOLVED
CASE 1	4	Real Estate	1, 2
CASE 2	2	Energy	7, 8, 9
CASE 3	1	Energy	1, 7, 10
CASE 4	2	Automobiles & Components	1
CASE 5	2	Capital Goods	1, 2
CASE 6	7	Technology Hardware & Equipment	4
CASE 7	3	Materials	1, 7
CASE 8	10	Materials	1, 2, 7, 8, 9, 10
CASE 9	2	Materials	1, 7, 8, 9

COLLECTIVE INITIATIVES

Amundi supports several collective initiatives:

INITIATIVES	THEMES	SUPPORTED BY AMUNDI SINCE:
INSTITUTIONAL INVESTORS' GROUP ON CLIMATE CHANGE (IIGCC),	CLIMATE CHANGE	2003
CARBON DISCLOSURE PROJECT (CDP)	CO <sub>2</sub> EMISSIONS TRANSPARENCY OF ESG DATA	2004
FOREST FOOTPRINT DISCLOSURE PROJECT	DEFORESTATION	2009
WATER DISCLOSURE PROJECT	USE OF WATER RESOURCES	2010
ACCESS TO MEDECINE INDEX	ACCESS TO MEDICINE	2010
ACCESS TO NUTRITION INDEX	ACCESS TO FOOD	2013
UN GLOBAL COMPACT ENGAGEMENT ON LEADERS & LAGGARDS	ESG REPORTING	2008
EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (EITI)	RESPONSIBLE MANAGEMENT OF NATURAL RESOURCES	2006
CLINICAL TRIALS TRANSPARENCY	CLINICAL TRIALS	2014
HUMAN RIGHTS REPORTING AND ASSURANCE FRAMEWORKS INITIATIVE (RAFI)	HUMAN RIGHTS	2014
UNPRI LETTER CALLING STOCK EXCHANGES TO PUT IN PLACE VOLUNTARY GUIDANCE FOR ISSUERS ON REPORTING ESG INFORMATION BY THE END OF 2016.	ESG REPORTING	2015
IIGCC LETTER TO 77 EU COMPANIES ON THEIR POSITIONS AND LOBBYING ACTIVITIES ON EU CLIMATE AND ENERGY POLICY.	CLIMATE CHANGE	2015
PRI HUMAN RIGHTS ENGAGEMENT	HUMAN RIGHTS - ESG REPORTING	2015

These international initiatives group together institutional investors and professional asset managers. Their objective is to encourage companies to improve their practices and transparency in the fight against climate change and deforestation, the protection of water resources as well as healthcare and nutrition in developing countries. They also aim at getting oil and mining industries to adopt greater transparency in their relations with the countries in which they have operations. The human rights aspect is also included in the initiatives selected.

In addition, this year Amundi reiterated its support to several collective initiatives specific to the extractive and pharmaceutical industries, in line with our engagement themes, and also relating to global warming issues and the need to standardise ESG reporting. This approach buttresses the efforts made in the past two years with companies in these sectors.

In 2014, Amundi had welcomed the authors of the study “Access to Medicine Index” at its premises when the results were published. In 2015, Amundi reaffirmed its commitment to this initiative, of which it has been a signatory since 2010, by joining a collective initiative launched by the Access to Medicine Foundation. The objective is to encourage pharmaceutical groups to show more transparency in the information they communicate for the index and to improve the quality of data provided/reported by companies. The Access to Medicine Foundation also wants to encourage companies to strengthen their policies and action plans in response to the issue of access to medicine in low and middle income countries. For this purpose, Amundi has co-signed a letter calling leading pharmaceutical laboratories to participate as actively as possible in collecting data that will establish the 2016 ranking of best practices in terms of access to medicine. This letter is a prelude to more in-depth dialogue with each issuer, which will start once the 2016 ranking has been published. Moreover, via the *PRI Clearinghouse*<sup>\*</sup>, Amundi has been supporting a collective engagement since 2014 (launched at the initiative of BNP Paribas Investment Partners) to encourage pharmaceutical groups to show more transparency for clinical trials. This initiative took on a new dimension in 2015 and now includes more than 80 investors worldwide. Amundi is convinced that its engagement on the topic of human rights in the extractive sector for the last two years is complementary

with high-quality collective initiatives. In 2015, we therefore partnered the PRI initiative on human rights in the extractive industry. In a different way (exchanges are confidential), this enables us to be involved in our colleagues’ collective efforts and to further broaden the spectrum of companies with which we exchange, notably by approaching issuers less familiar with, and less willing to, address this sensitive topic.

In parallel with these collective initiatives at sector level, in 2015 Amundi also co-signed, with other investors and businesses, a letter for stock exchanges, asking them to set up (before the end of 2016) a “voluntary guidance for issuers” on ESG reporting and the quality of the information provided. The idea is that stock exchanges should provide written instructions to companies on the communication of ESG information. In the same spirit, Amundi co-signed two other letters this year: one via the *IIGCC*<sup>\*</sup>, asking the 77 largest European companies to clarify the positions they defend (lobbying) in terms of climate and energy policy; the second, co-signed by the CEOs of the 120 largest global investors, to the G7 Finance Ministers, asking them to commit formally to fighting global warming and encourage the introduction of long-term measures aimed at limiting the global temperature rise to 2°C.

In addition, Amundi became a member of new bodies such as the Montreal Carbon Pledge and the Green Bonds Principles and supports the Paris Green Bonds Statement of the Climate Bonds Initiative.

Finally, Amundi has continued its support for academic research:

- Amundi is one of the founding members of the Sustainable Finance and Responsible Investment chair sponsored by the French Asset Management Association (AFG) and steered jointly by the Toulouse Institut d’Economie Industrielle (IDEI) and the economics department of Ecole Polytechnique;
- Amundi also supports the Climate Economy chair, a joint initiative of CDC Climat and the Paris-Dauphine University, as a partner of the research unit on Carbon Prices and Market;
- Amundi is also a member of the steering committee and funds the FIR/PRI European award for Finance and Sustainable Development, which rewards the best European academic works in this field.

<sup>\*</sup> Definition in glossary

## DATA COLLECTION FOR RATING PURPOSES

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### PHILOSOPHY

In order to award a rating to all the stocks in its investment universe, Amundi has formed a partnership with eight suppliers of extra-financial data. Amundi thus awards ESG ratings to more than 4,000 issuers.

Furthermore, in order to fine-tune these ratings, the extra-financial analysts regularly stage meetings with more than 250 companies. These companies are selected according to Amundi's stake in their capital and to the weight of the stocks in the portfolios or in the benchmark indices.

Measuring the quality of ESG policies is a prerequisite to measure the progress made by companies within the scope of engagement for influence.

## RESULTS

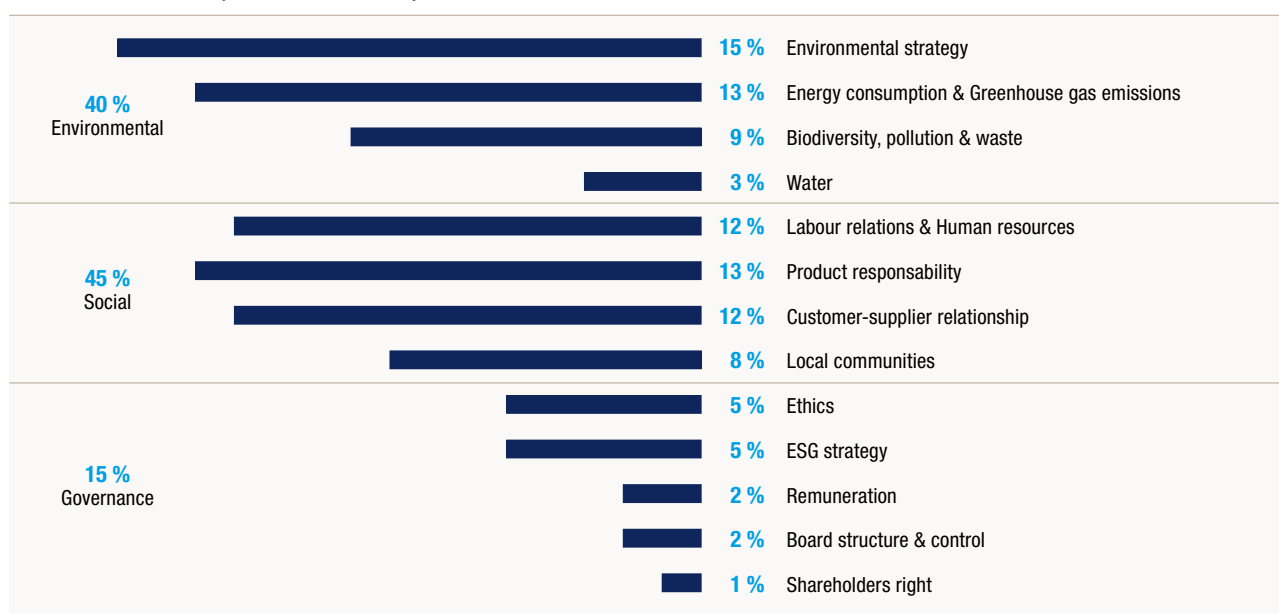
### Statistics

■ For 2015

<b>NUMBER OF INTERVIEWS*</b>	<b>338</b>
<b>EXTRA-FINANCIAL BILATERAL INTERVIEW</b>	<b>245</b>
> Credit & Action	105
> Credit only	2
> Equity only	138
<b>BILATERAL FINANCIAL INTERVIEW</b>	<b>93</b>
> Credit & Action	24
> Credit only	1
> Equity only	68
<b>NUMBER OF COMPANIES MET</b>	<b>274</b>
<b>NUMBER OF QUESTIONS ASKED</b>	<b>1,030</b>
<b>AVERAGE NUMBER OF THEMES ADDRESSED BY COMPANY</b>	<b>3</b>

\*The same company can be met several times.

■ Breakdown of subjects addressed by criterion in 2015



Further details in appendices:

- Breakdown of subjects addressed by sector and by region (Appendix 2)
- French companies met in 2014 in chronological order (Appendix 3)

## OPENING OF AN ESG ANALYSIS DESK IN ASIA

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### Amundi Japan Establishes Department Specialising in Responsible Investment

In April 2015, Amundi Japan, a wholly-owned subsidiary of Amundi Asset Management, newly established the ESG Research Department in the Investment Management Division. As a result, initiatives aimed at responsible investment at Amundi Japan will be strengthened. The ESG Research Department exercises voting rights for

Amundi Japan and conducts engagement activities related to the exercise of voting rights and corporate governance. In addition, it conducts ESG-related research activities targeting Japanese companies in cooperation with Amundi Asset Management's ESG analysts.

### In Japan, interest in ESG issues is growing thanks to policy support

The Abe Cabinet of the Liberal Democratic Party (LDP), as part of the Japan Revitalization Strategy, formulated two codes aimed at promoting sustainable growth of Japanese companies and the enhancement of corporate value. The Japanese version of the Stewardship Code was formulated in February 2014, with reference to the Stewardship Code of the United Kingdom, and had been signed by 201 investment organisations as of December 2015. The code is composed of seven principles. Principle 3 stipulates that "Institutional investors should monitor investee companies so that they can appropriately fulfil their stewardship responsibilities with an orientation towards the sustainable growth of the companies". With regard to the specific details that they should monitor, a variety of factors, including non-financial ones, are specified, such as governance of investee companies, corporate strategy, performance, capital structure, and risk management (including how the companies address risks arising from social and environmental matters). In June 2015, a corporate governance code applicable to all listed Japanese companies (more than 2,000 companies) was formulated based on the OECD Principles of Corporate Governance. The code consists of five general principles. Principle 2 stipulates: "Companies should take appropriate measures to address sustainability issues, including social and environmental matters"; and "With the recognition that dealing with sustainability issues is an

important element of risk management, the board should take appropriate actions to this end. Given the increasing demand and interest with respect to sustainability issues in recent years, the board should consider addressing these matters positively and proactively". Furthermore, Principle 3 specifies the following: "Companies should appropriately make information disclosure in compliance with the relevant laws and regulations, but should also strive to actively provide information beyond that required by law. This includes both financial information, such as financial standing and operating results, and non-financial information, such as business strategies and business issues, risk and governance. The board should recognize that disclosed information will serve as the basis for constructive dialogue with shareholders, and therefore ensure that such information, particularly non-financial information, is accurate, clear and useful". Also, in September 2015, at the United Nations summit for the adoption of the 2030 agenda for sustainable development, Prime Minister Abe mentioned that Japan's Government Pension Investment Fund (GPIF) had signed the United Nations Principles for Responsible Investment. Accordingly, even though Japan was previously lagging behind in the dissemination of SRI, initiatives aimed at ESG integration should increase going forward due to support in the policy area.

## 2015 activities of Amundi Japan's ESG Research Department

Based on Amundi's commitment to SRI, Amundi Japan signed the Japanese version of the stewardship code in May 2014, and in May 2015, it revised its acceptance policy for the code in association with the establishment of the new ESG Research Department. The policy stipulates the following: "At Amundi Japan, the ESG Research Department promotes activities to fulfil stewardship responsibilities. The ESG Research Department concentrates the process of exercising voting rights for domestic and foreign stocks and conducts ESG research while cooperating with Amundi's SRI Expertise. Moreover, as the secretariat of the Stewardship Responsibility Promotion Council, it promotes stewardship activities for various investment strategies within the Investment Management Division. Fund managers and analysts in the Fundamental Investment Group, which supports investment in Japanese stocks based on fundamental research, participate in the Stewardship Responsibility Promotion Council, and share engagement activities, including the exercise of voting rights and their outcomes within the Group. In addition, by promoting the mutual use of such information, the Council aims to broaden the range of activities aimed at fulfilling stewardship activities and build up the relevant experience of team members."

The ESG Research Department has held meetings relating to the exercise of voting rights with investee Japanese companies, and has also conducted meetings regarding the status of the response to the corporate governance code together with fund managers in the Investment Management Division. The number of companies that are addressing the corporate governance code has increased to approximately 1,700 as of January 2016, but if we take a general view of the response status, the transparency of the appointment process and the remuneration scheme for directors as well as the evaluation of the effectiveness

of board of directors' meetings are issues that need to be addressed further. As for the composition of the board of directors, the number of companies that have appointed at least one independent director due to the revision of the Companies Act has increased to more than half, but as the corporate governance code requires at least two independent directors, there appears to be further room for an increase in the proportion of independent directors.

Furthermore, the ESG Research Department actively participates in responsible investment initiatives such as PRI and CDP. It is participating in the "Human rights in the extractive sector policy", a PRI collaborative engagement, together with Amundi's ESG analysts, and Amundi Japan is taking part as a leading investor in the engagement with INPEX, a representative Japanese oil development company. Furthermore, Tokyo ESG department contributed to facilitating contact and analysis of Japanese companies by the Paris ESG department.

We also introduced Amundi's ESG strategy at such events as a study session at PRI Japan, a responsible investment seminar jointly sponsored by PRI Japan and the British Embassy in Tokyo, the CDP 2015 Japan Conference, and study groups with the CSR departments of Japanese companies. In addition, in terms of government-related activities, we gave a briefing on the global trend in ESG integration at a study group of LDP members, and introduced Amundi's ESG strategy and diversity research at an explanatory meeting for the Nadeshiko Brand, an initiative of the Ministry of Economy, Trade and Industry and the Tokyo Stock Exchange to select and publicise enterprises that encourage the empowerment of women. We are also participating as a committee member in the Ministry of the Environment's ESG Integration Committee.

## VOTING AT GENERAL MEETINGS AND PRE-MEETING DIALOGUE

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### PHILOSOPHY

Amundi focuses primarily on the financial performance of the companies in which it invests. This performance can only be sustainable as part of a long-term vision, combined with exemplary corporate governance and strong societal and environmental responsibility. Amundi comes fully into its own as a shareholder within this scope of analysis, notably by exercising its voting rights and through shareholder dialogue.

A special report on the exercise of voting rights and shareholder dialogue is available here:  
<http://about.amundi.com/Navigation/A-committed-player/Developingresponsible-finance>

#### ■ 2015 voting season

The 2015 voting season was marked by the debate on the promotion of long-term investment and the dangers of short-termism. Two approaches are emerging in this debate. The first is to reward stable shareholders through specific mechanisms. Examples include the French law of 29 March 2014, or “Loi Florange”, aimed at recapturing the real economy, the “competitiveness” decree in Italy, Toyota’s AA shares in Japan, and the debate in Hong Kong about multiple share classes following Alibaba’s IPO. The second approach concerns investor accountability, as seen in the development of stewardship codes or in the draft revision of the Shareholders Rights Directive. Although these two options are sometimes contradictory, Amundi considers they can be compatible in a pragmatic

approach and has changed its voting policy accordingly. Amundi has been required to rule on several cases of new loyalty mechanisms through its votes. They were studied on a case by case basis, considering the need for shareholder stability necessary to creating long term value and the risk of disproportionate control at the expense of minority shareholders. Concerning investor responsibility, Amundi remains convinced that an informed exercise of voting rights, combined with constructive dialogue focusing on improving practices, contributes to the long-term success of the companies in which it invests. The quality of the dialogue carried out in 2015 tends to confirm the validity of this engagement.



## RESULTS

In 2015, Amundi participated in more than 2,500 annual general meetings worldwide and engaged with more than 250 issuers, resulting in substantial improvements (warranting a change in our voting intentions) in corporate practices in almost fifty cases.

VOTING STATISTICS		
	2015	2014
<b>GENERAL MEETINGS AT WHICH WE VOTED</b>	<b>2 565</b>	<b>2 576</b>
> of which in France	263	253
> of which International	2 302	2 323
<b>GENERAL MEETINGS AT WHICH WE VOTED AGAINST AT LEAST ONE RESOLUTION</b>	<b>76%</b>	<b>74%</b>
> of which in France	83%	79%
> of which International	76%	74%
<b>RESOLUTIONS VOTED</b>	<b>32 396</b>	<b>31 237</b>
<b>VOTES AGAINST RESOLUTIONS</b>	<b>18%</b>	<b>17%</b>
THEMATIC BREAKDOWN OF VOTES AGAINST RESOLUTIONS		
STRUCTURE OF THE BOARD	43%	38%
REMUNERATION	26%	30%
CAPITAL TRANSACTION	16%	16%
SHAREHOLDER RESOLUTIONS	7%	7%
OTHER	8%	9%

STATISTICS ON SHAREHOLDER DIALOGUE		
	2015	2014
PRE-GM ALERTS	162	171
ISSUER INITIATIVES	98	95
<b>NUMBER OF ALERTS + ISSUER INITIATIVES</b>	<b>260</b>	<b>266</b>
> France	103	106
> International	157	160
<b>DIALOGUE RATE</b>	<b>72%</b>	<b>73%</b>
> France	73%	74%
> International	71%	71%

## EXAMPLES

COMPANY	COUNTRY	RESOLUTIONS	VOTE	CONTEXT
VOLKSWAGEN	Germany	Discharge given to Chairman of the Supervisory Board	○	Repeated failure to comply with good governance practices, notably in terms of independence of the Board and its committees, led us to not give discharge to the Chairman of the Board.
PUBLICIS	France	Introduction of non-voting members	○ then with- drawal	The company proposed the statutory introduction of non-voting members on the Board. After having discussed the merits of this measure and its implementation, we informed the company that we intended to vote against it. The resolution was finally withdrawn before the general meeting.
INTERTEK	United Kingdom	Remuneration report	○	The conditions under which the new CEO was hired, notably a guaranteed bonus and the offer to compensate him for share awards he lost after resigning from his previous employer by being granted shares with no performance conditions attached, did not seem justified. We voted against the resolution and more than 51% of shareholders voted against the remuneration report.
BP / SHELL	United Kingdom	External resolution on climate risks	○	The investor coalition "Aiming for A" filed resolutions asking for more transparency on the carbon risk's impact on return on investment. We voted for these resolutions and publicly announced our support ahead of BP's General Meeting.
REXEL	France	Performance shares	○ then ○	We felt the performance share plans lacked transparency, both ex-ante and ex-post. Despite a good dialogue, we voted against the resolution at the May general meeting and it was turned down. The company rescheduled a meeting in July, exchanged again and finally provided the information required to assess these plans. More than 98% of shareholders voted for the resolution.
ALCATEL / LAFARGE / SANOFI / ...	France	Severance pay	○	The question of the treatment of long term plans in the event of the chief executive's departure has arisen several times this season in France. In our view, the full maintenance of plans not yet acquired, or their acceleration, is not a good practice. A pro rata calculation could be an acceptable option.
APACHE / CITIGROUP	United States	External resolution on "proxy access"	○	With almost one hundred resolutions, proxy access was the biggest topic in external resolutions in the United States. We were mostly in favour of the "3%/3 years/25% of the Board" version. Most received negative recommendations from the Board, or even faced competing resolutions. However, these two companies chose to recommend voting for these resolutions, and we did so.

○ For - ○ Against

# APPENDICES

## APPENDIX 1

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### GLOSSARY

**3TG:** Tantalum, Tungsten, Tin and Gold.

**Business Roundtable:** Conservative lobby composed of executives of major US companies ([businessroundtable.org](http://businessroundtable.org))

**Code of conduct of the Electronic Industry Citizenship Coalition (EICC):** Set of principles relating to social, environmental and ethical issues for the electronics sector and its supply chain. These principles take as reference international standards, notably the International Labor Standards defined by the ILO and the OECD Guidelines for Multinational Enterprises. ([eiccoalition.org/standards/code-of-conduct](http://eiccoalition.org/standards/code-of-conduct))

**Codex:** the Codex Alimentarius Commission, established by the FAO and WHO in 1963, develops harmonised international food standards, guidelines and codes of practice to protect the health of consumers and ensure fair practices in the food trade. The Commission also promotes coordination of all food standards work undertaken by international governmental and non-governmental organisations.

**Conflict-free:** Products containing none of the minerals financing, directly or indirectly, armed groups in the Democratic Republic of Congo and its neighboring countries.

**Conflict Free Smelter Early Adopter Fund:** Initiative aiming to offer smelters a grant to finance the additional costs related to the audits. (<http://solutions-network.org/site-cfs>)

**Conflict-Free Smelter Program (CFSP):** The flagship of the CFSI, the Conflict-Free Smelter Program (CFSP) helps companies manage the theme of conflict minerals in their supply chain on the basis of independent audits carried out by third parties. These audits help identify the smelters that have a system to ensure a supply of "conflict-free" minerals. ([conflictfree-sourcing.org/conflict-free-smelter-program](http://conflictfree-sourcing.org/conflict-free-smelter-program))

**Conflict-Free Smelter Initiative (CFSI):** The CFSI comprises tools and resources such as the Conflict-Free Smelter Program, the Conflict Minerals Reporting Template, data from the Reasonable Country of Origin Inquiry as well as a range of reference materials on the sourcing of conflict minerals. The CFSI has more than 200 participating companies and manages several working groups on issues related to conflict minerals. It contributes to the development of all appropriate policies while communicating actively with the various NGOs concerned. ([conflictreesourcing.org](http://conflictreesourcing.org))

**Conflict-Free Tin Initiative (CFTI):** Project aiming to develop realistic and sustainable solutions to meet the challenges of conflict minerals and more specifically tin. (<http://solutions-network.org/site-cfti>)

**Conflict mineral:** Mineral extracted in the Democratic Republic of Congo (DRC) and neighboring countries and used to finance armed groups in these countries

**Contract Research Organization (CRO):** Research companies on contract provide the pharmaceutical, biotechnology and medical equipment sectors with research services on a contractual basis. A CRO can provide services such as biopharmaceutical development, the development of biological testing, marketing, preclinical research, clinical research, clinical trials management, and pharmacovigilance.

**Digital Europe Group:** Initiative representing the digital technology sector in Europe having set up several working groups on environmental, technical and regulatory aspects. ([digitaleurope.org](http://digitaleurope.org))

**EFPIA Code (European Federation of Pharmaceutical Industries and Associations):** EFPIA is the representative body of the pharmaceutical industry in Europe. Its code frames relations and interactions between the industry and healthcare professionals. Promoting transparency is one of the pillars of the code. ([transparency.efpia.eu](http://transparency.efpia.eu))

**Electronics Industry Citizenship Coalition (EICC):** Founded in 2004, the EICC is a group of companies in the electronics sector aiming to establish social, environmental and ethical standards for the sector as a whole and its supply chain. ([eiccoalition.org](http://eiccoalition.org))

**Enough Project:** Project stemming from the Center for American Progress aimed at ending genocide and crimes against humanity. Founded in 2007, Enough focuses on crises in Sudan, southern Sudan and Congo. Enough conducts intensive field studies and has developed several tools to provide citizens and working groups with practical methods to cope with these crises. ([enoughproject.org](http://enoughproject.org))

**European Commission's Transparency Register:** "Citizens can, and indeed should, expect the EU decision-making process to be as transparent and open as possible. The more open the process is, the easier it is to ensure balanced representation and avoid undue pressure and illegitimate or privileged access to information or to decision-makers. Transparency is also a key part of encouraging European citizens to participate more actively in the democratic life of the EU. The transparency register has been set up to answer core questions such as what interests are being pursued, by whom and with what budgets. The system is operated jointly by the European Parliament and the European Commission. The inter-institutional agreement between the European Parliament and the European Commission sets the rules and principles on which the transparency register is based. The first agreement (signed in June 2011) was the subject of a review after two years. The revised agreement was adopted in April 2014." (<http://ec.europa.eu/transparencyregister>)

**Global e-Sustainability Initiative (GeSI):** An initiative launched in collaboration with several major players in the electronics and communication sector and global organisations, GeSI is an independent source of information and resources aimed at the promotion of the best social and environmental practices in the sector of electronics and communication. ([gesi.org](http://gesi.org))

**Grievance mechanisms:** "A grievance mechanism is a process consisting in receiving, investigating and responding to the concerns and complaints formulated by the stakeholders concerned, in a timely and systematic manner." (IPIECA)

**IFPMA Code:** Also known under the name of Code of Pharmaceutical Marketing Practice of the International Federation of Pharmaceutical Manufacturers & Associations, the IFPMA code sets standards for the ethical promotion of pharmaceutical products. Its purpose is to ensure that the interactions between industry leaders and healthcare professionals "are appropriate and perceived as such". ([ifpma.org](http://ifpma.org))

**Institutional Investors Group on Climate Change (IIGCC):** "is a network of 120 members, composed of some of the largest pension funds and asset managers in Europe, which account for nearly €13 trillion in assets and adopt a proactive approach to the management of the risks and opportunities related to climate change." ([www.iigcc.org](http://www.iigcc.org))

**IPIECA:** "IPIECA is the international association for research on the environmental and social issues of the oil and gas sector. IPIECA helps oil and gas companies to achieve better results on environmental and social aspects. The IPIECA social responsibility working group is currently studying human rights, indigenous peoples, local content, sustainable social investment, management systems and responsible security. Many of its publications set standards in the sector." (IPIECA)

**Marketing authorisation:** Authorisation given to the holder of the rights to a drug manufactured industrially for it to be marketed. When a pharmaceutical laboratory wishes to put a health product on the market, it must file an application with the relevant authority.

**National Association of Manufacturers:** Association of US industrial companies aiming to improve the competitiveness of American manufacturers by encouraging the creation of a legislative and regulatory environment favourable to its members. ([nam.org](http://nam.org))

**OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas:** Set of detailed recommendations aimed at helping companies to respect human rights and prevent contribution to the financing of armed forces through purchases of minerals. The Due Diligence Guidance is usable by any company that could purchase conflict minerals. ([oecd.org/corporate/mne/mining](http://oecd.org/corporate/mne/mining))

**OECD Guidelines:** The OECD Guidelines for Multinational Enterprises are recommendations to help these companies conduct their activities in a responsible manner. 44 Governments have adhered to the guidelines (representing all regions of the world and 85% of foreign direct investment) and encourage their companies to observe them, regardless of where they operate. ([oecd.org](http://oecd.org))

**Physician Payment Sunshine Act:** Requires that manufacturers of drugs and other medical or biological devices involved in health programmes in the United States be transparent. They are requested to report the payments and objects of value offered to healthcare professionals (primarily doctors and teaching hospitals). This payment transparency programme is commonly referred to as 'Open Payments Program'. In this context, manufacturers are now required to disclose this information in a specific report. ([ama-assn.org](http://ama-assn.org))

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**PPA:** Public-Private Alliance for responsible minerals trade : Multi-sector initiative bringing together companies, government representatives and NGOs, aimed at the promotion of solutions for the transparency of the supply chain in DRC. This initiative provides funding and coordinates working groups to encourage responsible sourcing in the region. ([resolv.org/site-ppa](http://resolv.org/site-ppa))

**PRI Clearinghouse:** “is a unique global platform for collaborative engagement initiatives. It provides PRI signatories with a private forum to pool resources, share information, enhance influence and engage with companies, stakeholders, policymakers and other actors in the investment value chain on environmental, social and corporate governance issues across different sectors and regions. The vision of the Clearinghouse is to foster sustainable long-term value creation through collaboration, benefiting the environment and society as a whole.” ([www.unpri.org](http://www.unpri.org))

**RAFI (Reporting and Assurance Frameworks Initiative):** “RAFI is an international advisory project to develop frameworks of reference for reporting and its reliability, based on the UN guiding principles. This project was initiated by Shift (an independent non-profit organisation for the respect of human rights in business) and Mazars (international audit, accounting and advisory firm) in cooperation with the resource center for human rights of ASEAN (the Association of South-East Asian nations).” (<http://shiftproject.org/project/human-rights-reporting-and-assuranceframeworksinitiative-rafi>)

**Raise Hope for Congo:** A campaign of the Enough Project devoted to the defence of citizens of the Democratic Republic of Congo and the fight against local conflicts. Raise Hope for Congo and the Enough Project collaborate with national groups in the United States and local Congolese organisations. ([raisehopeforcongo.org](http://raisehopeforcongo.org))

**Resolve:** NGO founded in 1977 to address environmental, social and health challenges. This organisation provides lasting solutions to identified problems and develops collaborative approaches and dedicated programmes. ([resolv.org](http://resolv.org))

**SEC (Securities & Exchange Commission):** US federal agency for the regulation and control of financial markets. ([sec.gov](http://sec.gov))

**Section 1502 du Dodd-Frank Act (Dodd-Frank Wall Street Reform and Consumer Protection Act (2010)):** Regulation imposing transparency and disclosure requirements on companies that use to manufacture their products conflict minerals extracted in the Democratic Republic of Congo (DRC) and neighboring countries. This regulation is applicable to manufacturing companies which need conflict minerals for the production or use of end products.

**Solutions for Hope:** Platform designed to support companies and NGOs on the theme of responsible sourcing of minerals from conflict zones. ([solutions-network.org/site-solutionsforhope](http://solutions-network.org/site-solutionsforhope))

**United Nations Global Compact (UN Global Compact):** “The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour and environmental standards, and the fight against corruption.” ([unglobalcompact.org](http://unglobalcompact.org))

**United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) & Principes de John Ruggie:** “In June 2011, the United Nations Human Rights Council adopted a new framework for corporate human rights. This set of principles is designed to make companies better respect human rights in their practices and management. The Guiding Principles adopted by the Council are the result of six years of research conducted by Harvard professor John Ruggie, involving governments, businesses, civil society organisations and investors from all over the world. The Principles are based on 47 consultations and visits to more than 20 countries as well as online consultations, enabling people from 120 countries to participate. The new standards should make it possible to apply the United Nations framework, “Protect, Respect, Remedy” so as to better manage business and protect human rights.” ([un.org](http://un.org))

**US Chamber of commerce:** Non-profit business federation representing about three million businesses in the country, 2,000 local and State chambers, and 830 business associations, aiming to promote human progress through an economic, political and social system based on individual freedom, incentive, initiative, opportunity and responsibility. ([uschamber.com](http://uschamber.com))

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*US PhRMA Code on Interactions with Healthcare Professionals:* PhRMA (Pharmaceutical Research and Manufacturers of America) represents pharmaceutical and biotechnology companies (research-based). The PhRMA code frames and defines the ethical relations of the industry in the United States. (phrma.org)

*Voluntary Principles on Security on Human Rights (VPSHR):* "Founded in 2000, the Voluntary Principles on Security and Human Rights are a set of principles designed to guide companies in maintaining the safety and security of their operations within an operating framework that encourages respect for human rights." (voluntaryprinciples.org)

## Global Compact - The ten principles

***Principle 1***

Businesses should support and respect the protection of internationally proclaimed human rights; and

***Principle 2***

Make sure that they are not complicit in human rights abuses.

***Principle 3***

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

***Principle 4***

The elimination of all forms of forced and compulsory labour.

***Principle 5***

The effective abolition of child labour; and

***Principle 6***

The elimination of discrimination in respect of employment and occupation.

***Principle 7***

Businesses should support a precautionary approach to environmental challenges.

***Principle 8***

Undertake initiatives to promote greater environmental responsibility; and

***Principle 9***

Encourage the development and diffusion of environmentally friendly technologies.

***Principle 10***

Businesses should work against corruption in all its forms, including extortion and bribery. (www.unglobalcompact.org)

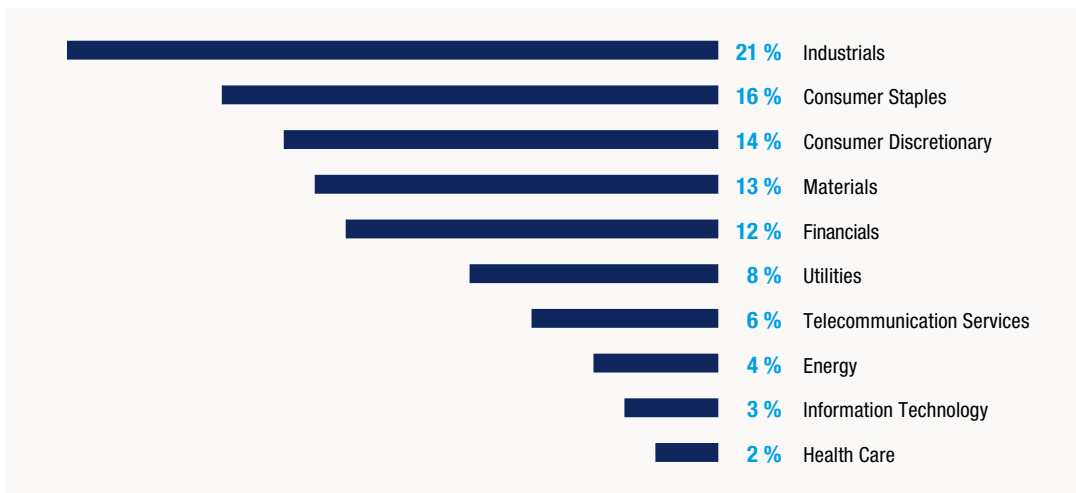




## APPENDIX 2

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### Breakdown of subjects addressed by sector



### Breakdown of subjects addressed by region



## APPENDIX 3

### French companies met in 2015 in chronological order

SRI Analysis team

COMPANY	ISIN	GEOGRAPHIC AREA	DATE	ENVIRONMENTAL STRATEGY	EMISSIONS AND ENERGY USE	WATER	
VEOLIA ENVIRONNEMENT	FR0000124141	FRANCE	13/01/2015				
THALES SA	FR0000121329	FRANCE	20/01/2015		●		
ENGIE	FR0010208488	FRANCE	29/01/2015				
AIRBUS GROUP SE	NL0000235190	FRANCE	04/02/2015				
VINCI SA	FR0000125486	FRANCE	04/02/2015				
MICHELIN (CIE GALE DES ETABTS)	FR0000121261	FRANCE	10/02/2015	●			
ALTRAN TECHNOLOGIES SA	FR0000034639	FRANCE	12/02/2015		●		
CAP GEMINI SA	FR0000125338	FRANCE	12/02/2015		●		
FAURECIA	FR0000121147	FRANCE	13/02/2015	●			
LEGRAND FRANCE SA	FR0010307819	FRANCE	13/02/2015	●	●		
OREAL (L) SA	FR0000120321	FRANCE	16/02/2015				
RENAULT SA	FR0000131906	FRANCE	16/02/2015	●	●		
ELECTRICITE DE FRANCE-EDF SA	FR0010242511	FRANCE	17/02/2015		●		
DASSAULT SYSTEMES SA	FR0000130650	FRANCE	18/02/2015	●	●		
CAP GEMINI SA	FR0000125338	FRANCE	20/02/2015	●	●		
ENGIE	FR0010208488	FRANCE	27/02/2015		●	●	
LEGRAND FRANCE SA	FR0010307819	FRANCE	27/02/2015	●	●		
EUTELSAT COMMUNICATIONS	FR0010221234	FRANCE	02/03/2015				
EUTELSAT COMMUNICATIONS	FR0010221234	FRANCE	03/03/2015				
THALES SA	FR0000121329	FRANCE	03/03/2015				
SAFRAN SA	FR0000073272	FRANCE	04/03/2015				
VIVENDI SA	FR0000127771	FRANCE	04/03/2015				
AXA SA	FR0000120628	FRANCE	05/03/2015	●			
DASSAULT SYSTEMES SA	FR0000130650	FRANCE	05/03/2015	●	●		
SCOR SE	FR0010411983	FRANCE	05/03/2015	●			
CAISSE NTLE PREVOYANCE-CNP ASS	FR0000120222	FRANCE	06/03/2015				
CARREFOUR SA	FR0000120172	FRANCE	09/03/2015				
ALSTOM SA	FR0010220475	FRANCE	12/03/2015	●	●		
CREDIT AGRICOLE SA	FR0000045072	FRANCE	13/03/2015				
ORANGE SA	FR0000133308	FRANCE	18/03/2015				
AIR LIQUIDE SA	FR0000120073	FRANCE	19/03/2015	●	●		
VIVENDI SA	FR0000127771	FRANCE	19/03/2015				
ORANGE SA	FR0000133308	FRANCE	20/03/2015				
SCHNEIDER ELECTRIC SE	FR0000121972	FRANCE	27/03/2015	●	●		
RENAULT SA	FR0000131906	FRANCE	03/04/2015	●	●		
HERMES INTERNATIONAL	FR0000052292	FRANCE	10/04/2015	●	●	●	

	WASTE, RECYCLING, BIODIVERSITY & POLLUTION	LABOUR RELATIONS & EMPLOYMENT PRACTICES	SUPPLY CHAIN & CUSTOMERS	SUPPLY CHAIN & CUSTOMERS	COMMUNITY INVOLVEMENT & HUMAN RIGHTS	INDEPENDENCE & CONTROL	REMUNERATION	SHAREHOLDERS' RIGHTS	ETHICS	ESG STRATEGY
		●	●						●	●
										●
		●	●						●	●
		●					●			●
		●								●
		●								●
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		●	●							●
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		●	●							
	●	●	●							
	●	●	●							
	●	●	●							

SRI Analysis team

COMPANY	ISIN	GEOGRAPHIC AREA	DATE	ENVIRONMENTAL STRATEGY	EMISSIONS AND ENERGY USE	WATER	
SODEXO	FR0000121220	FRANCE	17/04/2015				
ZODIAC AEROSPACE	FR0000125684	FRANCE	23/04/2015				
LAFARGE SA	FR0000120537	FRANCE	27/04/2015				
SAFRAN SA	FR0000073272	FRANCE	27/04/2015	●	●	●	
KERING	FR0000121485	FRANCE	05/05/2015		●	●	
SAFRAN SA	FR0000073272	FRANCE	06/05/2015				
SOCIETE GENERALE	FR0000130809	FRANCE	07/05/2015	●			
SEB SA	FR0000121709	FRANCE	13/05/2015	●	●	●	
AIR FRANCE-KLM	FR0000031122	FRANCE	19/05/2015	●	●		
LEGRAND FRANCE SA	FR0010307819	FRANCE	21/05/2015				
AIR LIQUIDE SA	FR0000120073	FRANCE	26/05/2015	●	●		
CAP GEMINI SA	FR0000125338	FRANCE	02/06/2015				
BNP PARIBAS	FR0000131104	FRANCE	04/06/2015	●			
ELECTRICITE DE FRANCE-EDF SA	FR0010242511	FRANCE	09/06/2015		●		
ENGIE	FR0010208488	FRANCE	09/06/2015		●	●	
DANONE (EX GROUPE DANONE)	FR0000120644	FRANCE	11/06/2015	●	●	●	
SECHE ENVIRONNEMENT SA	FR0000039109	FRANCE	11/06/2015		●	●	
VEOLIA ENVIRONNEMENT	FR0000124141	FRANCE	12/06/2015		●	●	
AIR LIQUIDE SA	FR0000120073	FRANCE	24/06/2015	●	●		
KORIAN	FR0010386334	FRANCE	29/06/2015	●	●		
SOPRA STERIA GROUP	FR0000072910	FRANCE	06/07/2015	●	●		
CARREFOUR SA	FR0000120172	FRANCE	08/07/2015				
OREAL (L) SA	FR0000120321	FRANCE	31/08/2015				
SUEZ ENVIRONNEMENT COMPANY SA	FR0010613471	FRANCE	03/09/2015				
AIR FRANCE-KLM	FR0000031122	FRANCE	04/09/2015		●		
EUROPCAR GROUPE SA	FR0012789949	FRANCE	04/09/2015	●		●	
PERNOD-RICARD SA	FR0000120693	FRANCE	04/09/2015				
CARREFOUR SA	FR0000120172	FRANCE	07/09/2015				
ACCOR SA	FR0000120404	FRANCE	08/09/2015	●	●		
ELECTRICITE DE FRANCE-EDF SA	FR0010242511	FRANCE	08/09/2015		●		
EUTELSAT COMMUNICATIONS	FR0010221234	FRANCE	08/09/2015				
RENAULT SA	FR0000131906	FRANCE	09/09/2015				
AIR FRANCE-KLM	FR0000031122	FRANCE	16/09/2015	●	●		
KERING	FR0000121485	FRANCE	17/09/2015				
BNP PARIBAS	FR0000131104	FRANCE	18/09/2015	●	●	●	
ENGIE	FR0010208488	FRANCE	22/09/2015		●	●	
CARREFOUR SA	FR0000120172	FRANCE	25/09/2015				
TOTAL SA	FR0000120271	FRANCE	25/09/2015				



SRI Analysis team

COMPANY	ISIN	GEOGRAPHIC AREA	DATE	ENVIRONMENTAL STRATEGY	EMISSIONS AND ENERGY USE	WATER	
LEGRAND FRANCE SA	FR0010307819	FRANCE	30/09/2015	●	●		
OREAL (L) SA	FR0000120321	FRANCE	30/09/2015				
CASINO GUICHARD PERRACHON SA	FR0000125585	FRANCE	01/10/2015				
OREAL (L) SA	FR0000120321	FRANCE	01/10/2015				
ZODIAC AEROSPACE	FR0000125684	FRANCE	06/10/2015				
AIR LIQUIDE SA	FR0000120073	FRANCE	12/10/2015				
KLEPIERRE	FR0000121964	FRANCE	12/10/2015	●			
BOUYGUES SA	FR0000120503	FRANCE	13/10/2015		●		
DANONE (EX GROUPE DANONE)	FR0000120644	FRANCE	15/10/2015	●		●	
LVMH-MOET HENNESSY LOUIS VUITT	FR0000121014	FRANCE	19/10/2015				
TOTAL SA	FR0000120271	FRANCE	25/09/2015				
FAURECIA	FR0000121147	FRANCE	21/10/2015		●		
DASSAULT SYSTEMES SA	FR0000130650	FRANCE	06/11/2015	●	●		
SOCIETE GENERALE	FR0000130809	FRANCE	06/11/2015				
SOITEC	FR0004025062	FRANCE	06/11/2015				
SOCIETE GENERALE	FR0000130809	FRANCE	09/11/2015		●		
VINCI SA	FR0000125486	FRANCE	09/11/2015	●	●		
ILE DE FRANCE	FR0010348680	FRANCE	10/11/2015	●			
LA POSTE	FR0008023420	FRANCE	10/11/2015	●			
SCHNEIDER ELECTRIC SE	FR0000121972	FRANCE	10/11/2015	●	●		
VEOLIA ENVIRONNEMENT	FR0000124141	FRANCE	10/11/2015	●			
CAISSE NTLE PREVOYANCE-CNP ASS	FR0000120222	FRANCE	16/11/2015				
GECINA SA	FR0010040865	FRANCE	17/11/2015	●	●		
VICAT SA	FR0000031775	FRANCE	17/11/2015	●	●		
BOUYGUES SA	FR0000120503	FRANCE	18/11/2015	●	●		
EIFFAGE SA	FR0000130452	FRANCE	18/11/2015	●	●		
MICHELIN (CIE GALE DES ETABTS)	FR0000121261	FRANCE	19/11/2015	●			
VALLOUREC SA	FR0000120354	FRANCE	19/11/2015	●	●		
ENGIE	FR0010208488	FRANCE	20/11/2015	●	●		
RENAULT SA	FR0000131906	FRANCE	20/11/2015	●	●		
KLEPIERRE	FR0000121964	FRANCE	23/11/2015	●	●		
COMPAGNIE DE SAINT-GOBAIN	FR0000125007	FRANCE	25/11/2015	●	●		
UNIBAIL-RODAMCO SE	US9045871020	FRANCE	25/11/2015	●	●		
HAVAS SA	FR0000121881	FRANCE	26/11/2015				
EUROPCAR GROUPE SA	FR0012789949	FRANCE	04/12/2015	●	●		
AXA SA	FR0000120628	FRANCE	09/12/2015				
COMPAGNIE DE SAINT-GOBAIN	FR0000125007	FRANCE	17/12/2015				
VEOLIA ENVIRONNEMENT	FR0000124141	FRANCE	17/12/2015				



Corporate governance team: List of commitments made in 2015 (alerts and initiative of issuers)

COMPANY	COUNTRY
ABB	Switzerland
ABENGOA	Spain
ABERTIS	Spain
ACCIONA	Spain
ACCOR	France
ACS	Spain
ACTELION LIMITED	Switzerland
ADIDAS	Germany
ADOCIA	France
ADVANCED SEMICONDUCTOR ENGINEERING	Taiwan
AEGON NV	Netherlands
AHOLD	Netherlands
AIR FRANCE	France
AIR LIQUIDE	France
AIRBUS GROUP	Netherlands
AKZO NOBEL NV	Netherlands
ALCATEL	France
ALSTOM	France
ALTEN	France
ALTRAN	France
AMADEUS	Spain
ANDRITZ	Austria
ANHEUSER BUSCH INBEV SA	Belgium
APACHE	USA
APERAM SA	Luxembourg
ARCELOR MITTAL SA	Luxembourg
AREVA	France
ARKEMA	France
ASML HOLDING NV	Netherlands
ASTALDI	Italy
ATOS	France
AXA	France
AXEL SPRINGER	Germany
BANCO COMMERCIAL PORTUGUES	Portugal

COMPANY	COUNTRY
BANCO POPULAR	Spain
BANCO SABADELL	Spain
BANCO SANTANDER	Spain
BANKIA	Spain
BBVA	Spain
BEIERSDORF	Germany
BELGACOM	Belgium
BG	UK
BHP BILLITON	UK
BIC	France
BIOMERIEUX	France
BMW	Germany
BNP	France
BOFA	USA
BOLSAS Y MERCADOS	Spain
BOUYGUES	France
BURBERRY	UK
BUREAU VERITAS	France
CAIXA BANK	Spain
CAP GEMINI	France
CARLSBERG	Denmark
CARREFOUR	France
CASA	France
CASINO	France
CASTELLUM	Sweden
CGG	France
CLARIANT	Switzerland
CLUB MED	France
COFACE	France
COMMERZBANK	Germany
CONTINENTAL AG	Germany
CREDIT SUISSE GROUP AG	Switzerland
CYFROWY POLSAT	Pologne
DANONE	France
DBV	France



COMPANY	COUNTRY
DEUTSCHE LUFTHANSA	Germany
DEUTSCHE BANK	Germany
DEUTSCHE BORSE	Germany
DEUTSCHE EUROSHOP	Germany
DIA	Spain
E.ON	Germany
EDENRED	France
EDP ENERGIAS	Germany
EDP RENOVAIS	Portugal
EIFFAGE	France
ENAGAS	Spain
ENDESA	Spain
ENI	Italy
ESSILOR	France
EULER HERMES	France
EURAZEO	France
EUROFINS SCIENTIFIC SE	Luxembourg
EUROTUNNEL	France
EUTLESAT	France
FAURECIA	France
FDR	France
FERROVIAL	Spain
FIAT CHRYSLER AUTOMOBILES NV	Netherlands
FINMECCANICA	Italy
FIRST GULF BANK PJSC	United Arab Emirates
FOMENTO DE CONSTRUCCIONES	Spain
GALP ENERGIA	Portugal
GAMESA	Spain
GAS NATURAL	Spain
GAZTRANSPORT	France
GBL	Belgium
GDF	France
GECINA	France
GEMALTO	Netherlands

COMPANY	COUNTRY
GENERALI	Italy
GENFIT	France
GRIFOLS	Spain
GROUPE DELHAIZE	Belgium
HANNOVER RE	Germany
HEIDELBERG CEMENT	Germany
HEINEKEN HOLDING & HEINENKEN NV	Netherlands
HENKEL	Germany
HERMES	France
HUFVUDSTADEN	Sweden
IBERDOLA	Spain
ICADE	France
ICG AIRLINES	Spain
ILIAD	France
IMERYS	France
INBEV	Belgium
INDITEX	Spain
INDRA	Spain
INFINEON	Germany
ING	Netherlands
INGENICO	France
INNATE PHARMA	France
INTESA	Italy
IPSEN	France
IPSOS	France
JCDECAUX	France
JERONIMO MARTINS	Portugal
JYSKE BANK	Denmark
KABEL	Germany
KBC GROUP NV	Belgium
KERING	France
KLEPIERRE	France
KLOCKNER	Germany
KONE	Finland

Corporate governance team: List of commitments made in 2015 (alerts and initiative of issuers)

COMPANY	COUNTRY
KORIAN	France
KPN	Netherlands
LAFARGE	France
LAGARDERE	France
LANXESS	Germany
LECTRA	France
LEGRAND	France
LINDT & SPRUENGLI AG	Switzerland
L'OREAL	France
LUNDBECK	Denmark
LVMH	France
M6	France
MAN SE	Germany
MAPFRE	Spain
MAUREL & PROM	France
MEDIOBANCA	Italy
MERCIALYS	France
MERCK KGAA	Germany
MERLIN PROPERTIES	Spain
METRO	Germany
MICHELIN	France
MOBISTAR	Belgium
MONTUPET	France
MOTA ENGIL	Portugal
MUNICH RE	Germany
NATIONAL BANK OF GREECE SA	Greece
NATIXIS	France
NEOPOST	France
NESTLE	Switzerland
NEXANS	France
NEXITY	France
NH HOTEL	Spain
NOKIA CORPORATION	Finland

COMPANY	COUNTRY
NORDEA BANK	Sweden
NOVARTIS	Switzerland
NOVO DORDISK	Denmark
NOVOZYMES A/S	Denmark
OMV AG	Austria
ORANGE	France
ORIENTAL WEAVERS	Egypte
ORION	Finland
ORPEA	France
OSRAM	Germany
OTP BANK PLC	Hongrie
PERNOD	France
PETROLEUM GEO SERVICES ASA	Norvège
PEUGEOT	France
PHAROL	Portugal
PHILIPS NV	Netherlands
PLASTIC OMNIUM	France
PORTUCEL	Portugal
PORTUGAL TELECOM	Portugal
PRYSMIAN	Italy
PSP SWISS PROPERTY AG	Switzerland
PUBLICIS	France
PUMA	Germany
QIAGEN NV	Netherlands
RED ELECTRICA	Spain
REDES ENERGETICAS	Portugal
REMY COINTREAU	France
RENAULT	France
REPSOL	Spain
REXEL	France
RUBIS	France
RWE	Germany
SAFRAN	France
SAFT	France

COMPANY	COUNTRY
SAINT GOBAIN	France
SAIPEM	Italy
SAMSUNG C&T	South Korea
SAMSUNG ELECTRONICS	Hong Kong
SANLAM LIMITED	South Africa
SANOFI	France
SAP SE	Germany
SBM OFFSHORE NV	Netherlands
SCHNEIDER	France
SCOR	France
SEB	France
SG	France
SIEMENS	Germany
SNAM	Italy
SODEXO	France
SOLOCAL	France
SOLVAY SA	Belgium
ST MICROELECTRONICS NV	Netherlands
STROERR	Germany
SUBSEA 7 SA	Luxembourg
SUEZ ENVIRONNEMENT	France
TARKETT	France
TECHNICOLOR	France
TECHNIP	France
TEFEFONICA DEUTSCHLAND	Germany
TELECOM ITALIA	Italy
TELEFONICA ESPAGNE	Germany
TELENOR ASA	Norvège
TELEPERFORMANCE	France
TERNA	Italy
TF1	France
THALES	France
THYSSEN KRUPP	Germany
TNT EXPRESS NV	Netherlands
TOTAL	France

COMPANY	COUNTRY
TUI	Germany
UBISOFT	France
UBS GROUP NV	Switzerland
UCB SA	Belgium
UNIBAIL	France
UNICREDIT	Italy
UNILEVER NV	Netherlands
VALEO	France
VALLOUREC	France
VEOLIA	France
VINCI	France
VIRBAC	France
VIVENDI	France
VOLKSWAGEN	Germany
VOLVO AB	Sweden
WIHLBORGS FASTIGHETER AB	Sweden
X5 RETAIL GROUP	Netherlands
YAMANA	Canada
YOOX	Italy
ZEALAND PHARMA	Denmark
ZODIAC	France

## About Amundi

Amundi is the No.1 European Asset Manager and in the Top 10 worldwide<sup>1</sup> with AUM of close to €1,000 billion worldwide<sup>2</sup>.

Located at the heart of the main investment regions in more than 30 countries, Amundi offers a comprehensive range of products covering all asset classes and major currencies.

Amundi has developed savings solutions to meet the needs of more than 100 million retail clients worldwide and designs innovative, high-performing products for institutional clients which are tailored specifically to their requirements and risk profile.

The Group contributes to funding the economy by orienting savings towards company development.

Amundi has become a leading European player in asset management, recognised for:

- **Product performance and transparency;**
- **Quality of client relationships based on a long-term advisory approach;**
- **Efficiency in its organisation and teams' promise to serving its clients;**
- **Commitment to sustainable development and socially responsible investment policies.**

1. No.1 European asset manager based on global assets under management (AUM) and the main headquarters being based in Europe– Source IPE “Top 400 asset managers” published in June 2015 and based on AUM as at December 2014.
2. Amundi figures as of 31 December 2015.



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