

Corporate Social Responsibility (CSR) Assessment Report



Company Assessed : NTN SNR ROULEMENTS SA (GROUP)

Overall Score: 69/100 
December 2017 

CSR engagement: Advanced

Size: Large
Country (company headquarters): France
Presence in Risk Countries: Yes
Category/Industry: Manufacture of general-purpose machinery



TABLES OF CONTENTS

1. **Score Overview**
2. **Supplier Scorecard Objectives**
3. **Assessment Process**
4. **Ecovadis Methodology**
 - a. **Four themes with 21 criterias**
 - b. **Seven management indicators**
 - c. **Scoring Scale**
5. **How to understand company Scorecard**
 - a. **Quantitative information: score & activated criteria**
 - b. **Qualitative information: Strengths & Improvement Areas**
6. **Theme: Environment**
7. **Theme: Labor Practices & Human Rights**
8. **Theme: Fair Business Practices**
9. **Theme: Sustainable Procurement**
10. **360° - Stakeholder Information**
11. **Specific Comments**
12. **Contact us**

ABOUT CORPORATE SOCIAL RESPONSIBILITY (CSR)

Corporate Social Responsibility (CSR) is the continuing commitment to behave responsibly by integrating social and environmental concerns into business operations. CSR goes beyond regulatory compliance to focus on how companies manage their economic, social, and environmental impacts, as well as their relationships with stakeholders (e.g. employees, suppliers, government).

ABOUT THE ASSESSMENT

The EcoVadis methodology framework assesses the policies and measures put in place as well as the reporting published by companies with regards to environmental, labor practices & human rights, fair business practices and sustainable procurement issues. The assessment conducted by CSR experts is made on the basis of the company answers to a survey which is dynamically adapted to their country, sector and size, on the basis of supporting documentation, and on public and stakeholder (NGOs, trade unions, press) information.

ABOUT ECOVADIS

EcoVadis operates the 1st collaborative platform allowing companies to assess the environmental and social performance of their suppliers on a global basis. EcoVadis combines technology and Corporate Social Responsibility (CSR) expertise to deliver simple and reliable supplier scorecards, covering 150 purchasing categories and 21 CSR criteria.

This document cannot be reproduced or distributed unless otherwise specified in EcoVadis contractually granted license right. No part of this document may be modified in whole or in part and in any form prior express written permission of EcoVadis. EcoVadis does not warrant the accuracy, reliability, completeness of the information, content, text, graphics provided on this document.

1. Score Overview

OVERALL SCORE

69/100



CSR PERFORMANCE

Environnement	ENV	80	→
Social	LAB	70	→
Ethique des Affaires	FBP	50	↗
Achats Responsables	SUP	70	→

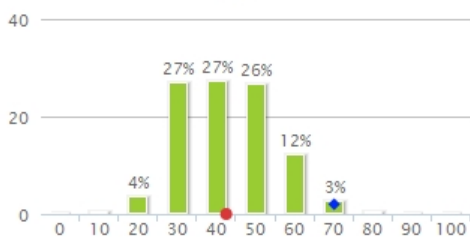
BENCHMARK



Not enough data to show benchmark please select other criteria.

Benchmark is done on all suppliers of the same business category on the EcoVadis database

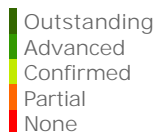
All



Corrective Action Plan in progress

The overall and theme scores summarize the CSR performance of NTN SNR ROULEMENTS SA (GROUP) on a scale of 1 to 100.

Legend



The grey bars on this graph represent the benchmarks. Benchmarks compare a company's overall score and theme scores to other companies operating within the same industry.

NOTE:

- ✦ The top and bottom 5% of performers are excluded to ensure statistical relevance.
- ✦ ENV : Environment
- ✦ LAB : Labor Practices & Human Rights
- ✦ FBP : Fair Business Practices
- ✦ SUP : Sustainable Procurement

This graph depicts the distribution of overall scores for several thousand companies on the EcoVadis platform. NTN SNR ROULEMENTS SA (GROUP) has an overall score of 69 and the company is ranked alongside 12% which have **Advanced** CSR engagement.

- ✦ The red dot represents the average of all suppliers
- ✦ The blue diamond refers to company position

NTN SNR ROULEMENTS SA (GROUP) has been identified as **Gold** regarding their approach to CSR management. To achieve this recognition, a company must have an overall score of [62-100].

The Corrective Action Plan (CAP) is an interactive tool shared between suppliers and buyers. It helps to develop Action Plans, a starting point for an effective dialogue on actions taken by the supplier to improve their CSR performance. NTN SNR ROULEMENTS SA (GROUP) has a CAP in place and is working on improving their CSR management system.

2. Supplier Scorecard Objectives

UNDERSTAND:

- **Get a clear picture of the company's CSR performance.** With a score on four CSR themes (environmental, labor practices & Human Rights, fair business practices and sustainable procurement), that highlight the company's strengths and possible areas for improvement.
- **Know the company's positioning compared to their industry sector peers.** On which theme is this company better positioned than their peers? How is this company positioned in comparison to their sector average?
- **Identify sector specific initiatives.** What are the main international CSR regulations and sector initiatives specific to the industry sector of the company?

COMMUNICATE:

- **Meet client needs.** More and more companies raise questions about their supplier's environmental and social performance. This assessment allows to demonstrate company commitment.
- **Leverage a unique communication tool.** Directly share the assessment results with all clients.

3. Assessment Process



4. EcoVadis Methodology is based on

A. Four themes with 21 criteria

The EcoVadis methodology takes into account 21 CSR criteria which are contained under four themes: ENVIRONMENT, LABOR, FAIR BUSINESS PRACTICES, and SUSTAINABLE PROCUREMENT. The methodology and criteria are in line with international CSR standards including the Global Reporting Initiative, United Nations Global Compact, and ISO 26000.



B. Seven management indicators

The EcoVadis assessment evaluates a company CSR management system by looking at **seven management indicators**. The four themes and their subsequent 21 CSR criteria are assessed on the basis of the following management indicators that a company has in place.



Policies (weight: 25%)

- Policies:** Mission statements, commitments, principles, objectives and/or policies issued by the company.
- Endorsement:** Endorsement of CSR external initiatives, principles and/or active participation to international/sector CSR initiative.

Actions (weight: 35%)

- Measures:** Concrete actions put in place to support commitments, objectives and deployment of policies (e.g. training, manual procedures).
- Coverage:** Level of deployment/dissemination of measures and concrete actions put in place throughout the company to support commitments and/or policies.
- Certifications:** Certifications received for the management system and/ or labels received for the products/ services delivered.

Results (weight: 40%)

- Reporting/ KPI:** Quality and level of reporting readily available to stakeholders
- 360°:** Controversies, condemnations or positive developments reported by stakeholders (NGOs, Trade Unions, Press) having an impact on the company's CSR performance.

5. How to understand company Scorecard

The overall score can be better understood by looking at quantitative information - **theme scores, activated criteria** - and qualitative information - **strengths & improvement areas**.

A. QUANTITATIVES INFORMATION: SCORES & ACTIVATED CRITERIA



THEME SCORES: Like the overall score, theme scores are on a scale of 1 to 100.

ACTIVATED CRITERIA: Each of the four themes - ENVIRONMENT, LABOR, FAIR BUSINESS PRACTICES, and SUSTAINABLE PROCUREMENT- have specific criteria associated to them. It is important to note that **not all 21 criteria are activated for every company and some criteria have more weight than others in the overall assessment**. The weights for the criteria are determined based on the CSR risks faced by the company according to their industry of operation and their country of operation(s). For more information see Appendix: category profile.

<input type="checkbox"/> Non Activated	If criteria are not activated, this means that the specific associated issue is not relevant or has very low CSR risk for the company
<input type="checkbox"/> Medium Importance	Medium importance criteria are the issues where there is some CSR risk, but it is not the most pressing criteria.
<input type="checkbox"/> High Importance	High-importance criteria are the issues where the company faces the greatest CSR risk.
<input type="checkbox"/> Only in Risk countries	Criteria classified as Only in Risk Countries are activated only if the company has significant operations in one or more risk country.

B. QUALITATIVE INFORMATION: STRENGTHS & IMPROVEMENT AREAS

Qualitative information provides more details and insights into the theme scores. For each theme the company is assigned Strengths (the elements of the CSR management system that are positive) and Improvement Areas (the elements of the CSR management system that need to be improved). The strengths & improvement areas are divided according to the 3 management indicators - Policies, Actions, Results – and are also classified by level of importance/priority (i.e. Priority.)

Green check marks indicate the Strengths 
Alert signs indicate the Improvement Areas 

Improvement Areas are a focus point for improvement. The EcoVadis Corrective Action Plan Tool allows companies to improve their CSR performance on specific improvement areas. It is an interactive tool shared between suppliers and buyers. It supports the development of Action Plans, a starting point for an effective dialogue between buyers and suppliers on actions taken by a supplier to improve their CSR performance.

Each improvement area is given a **priority** level which can be used to set up corrective action plans.

	Priority Level
High	
Medium	
Low	

C. THE SCORING SCALE

85-100	Outstanding →	<ul style="list-style-type: none"> Structured and proactive CSR approach Engagements/policies and tangible actions on all issues with detailed implementation information Comprehensive CSR Reporting on actions & KPI Innovative practices and external recognition
65-84	Advanced →	<ul style="list-style-type: none"> Structured and proactive CSR approach Engagements/policies and tangible actions on major issues with detailed implementation information Significant CSR Reporting on actions & performance indicators
45-64	Confirmed →	<ul style="list-style-type: none"> Structured and proactive CSR approach Engagements/policies and tangible actions on major issues Basic reporting on actions or performance indicators
25-44	Partial →	<ul style="list-style-type: none"> No structured CSR approach Few engagements or tangible actions on selected issues Partial reporting on KPIs Partial certification or occasional labeled product
0 - 24	None →	<ul style="list-style-type: none"> No engagements or tangible actions regarding CSR Evidence in certain cases of misconduct (e.g. pollution, corruption)

6. ENVIRONMENT

The environment theme takes into account both **operational factors** (e.g. energy consumption, waste management, etc.) and **product stewardship** (e.g. product end of life, customer health and safety issues).

ENVIRONMENT: SCORES

CSR PERFORMANCE

Environnement	ENV 80	→
Social	LAB 70	→
Ethique des Affaires	FBP 50	↗
Achats Responsables	SUP 70	→

WEIGHT of the Theme ENV

3 out of 11 -> 27% of the global score

Themes are weighted according the Corporate Social Responsibility (CSR) risks associated to the company industry of operation and country of operation(s). The theme weights influence the resulting overall score.

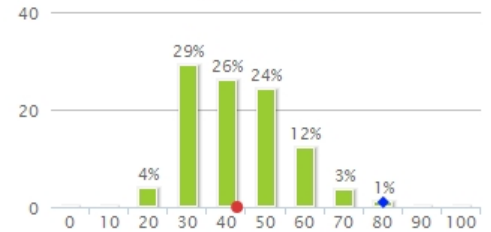
BENCHMARK



This benchmark shows the company overall score in comparison to the scores of industry sector peers on the EcoVadis platform. The top and bottom 5% of performers are excluded to ensure statistical relevance.

DETAILED SCORE BENCHMARK

ENVIRONMENT



The theme benchmark is a more detailed comparison of the company's theme score in comparison to other companies operating within the same industry. NOTE: Benchmark is only activated when they are at least 3 suppliers to compare with.

ENVIRONMENT: ACTIVATED CRITERIA

Non activé Importance moyenne Importance haute Seulement dans les pays à risques

Note: Not all 21 criteria are activated for every company and some criteria have more weight than others in the overall assessment. The weights for the criteria are determined based on the CSR risks faced by the company according to their industry of operation and their country of operation(s).

ENVIRONMENT: STRENGTH & WEAKNESSES

Note: The number of alert signs or checks next to a strength or weakness does not represent the performance of the company; rather they indicate the level of importance of each individual strength and/or weakness



This icon informs that the company has a Corrective Action Plan (CAP) in place associated to a particular weakness. The CAP is an interactive tool shared between suppliers and buyers. It helps to develop Actions to improve the supplier's CSR performance.

ENVIRONMENT: POLICIES

Priority	Strength or Weakness	Additional Definition	CAP
✓	Comprehensive policy on a majority of environmental issues	<p>More Information</p> <ul style="list-style-type: none"> A comprehensive environmental policy includes commitments and/or operational objectives on the majority of environmental risks the company faces, and integrates quantitative objectives (i.e. targets) on those risks. <p>Guidance</p> <ul style="list-style-type: none"> Policies are deemed exceptional when all environmental issues are covered by qualitative and quantitative objectives, in addition to some of the following elements: scope of application, allocation of responsibilities, and formal review processes. Download the How-to Guide on this topic here (in English). 	
✓	Quantitative objectives set on some relevant issues [i.e. energy consumption & GHGs, materials, chemical & waste]	<p>More Information</p> <ul style="list-style-type: none"> The company has defined and has formally communicated quantitative objectives (i.e. targets) with regard to the relevant environmental policy objectives. <p>Guidance</p> <ul style="list-style-type: none"> Quantitative objectives or targets on environmental issues are considered as fundamental elements of comprehensive policy mechanism. They provide a monitoring framework that helps establish whether policy objectives are being met, and highlight the progress towards set goals. Some examples of specific targets on this topic include quantitative objectives on issues such as energy consumption reduction. As policy elements, targets can be expressed in absolute or relative terms and must have a valid future deadline (i.e. by 2020 we commit to reduce our energy consumption by 20% from 2015 levels). Best practices are to issue valid quantitative objectives or targets for all relevant environmental issues in a particular industry sector. Download the How-to Guide on this topic here (in English). 	
✓	Global Compact signatory (at parent company level)	<p>More Information</p> <ul style="list-style-type: none"> The company's parent company is a Global Compact Signatory. <p>Guidance</p> <ul style="list-style-type: none"> The United Nations Global Compact (UNGC) is a voluntary initiative that encourages businesses worldwide to adopt sustainable and socially responsible policies, and to report on them. Global Compact participants commit to respecting 10 principles on human rights, labor rights, the environment and anti-corruption. The initiative has a mandatory disclosure framework, which obliges business participants to annually report on their progress against the 10 principles in a Communication on Progress (COP). Companies that do not comply with this reporting requirement are removed (or "delisted") from the list of participants after two years. 	

ENVIRONMENT: ACTIONS

Priority	Strength or Weakness	Additional Definition	CAP
✓	ISO 14001 certified on more than 81% of operational sites	<p>More Information</p> <ul style="list-style-type: none"> The assessed company has several operational sites. More than 81% of operational sites are ISO 14001 certified. <p>Guidance</p> <ul style="list-style-type: none"> Publicly available information or supporting documents show over 81% coverage of operational facilities certified against the ISO 14001 standard. Companies that have more than one operational site, office or subsidiary must demonstrate that environmental certificates (like ISO 14001) are deployed across a majority of sites in order to guarantee an effective company-wide CSR management system. 	
✓	Carbon footprint study	<p>More Information</p> <ul style="list-style-type: none"> The company has evaluated the total amount of greenhouse gases produced by its activities, its business or other unit of 	

Priority	Strength or Weakness	Additional Definition	CAP
		<p>analysis such as a specific entity or product, expressed in equivalent tons of carbon dioxide (CO2).</p> <p>Guidance</p> <ul style="list-style-type: none"> • A company's carbon footprint is made up of both the direct and indirect emissions. Direct CO2 emissions (e.g. coming from fuel consumption) include emissions from facilities, plants, property or assets that are owned or controlled by the company. Indirect CO2 emissions are a consequence of the activities of the company but occur at sources owned or controlled by another entity (e.g. coming from consumption of purchased electricity, heat or steam, transport-related activities in vehicles not owned or controlled by the reporting entity). 	
✓	Waste management measures in place	<p>More Information</p> <ul style="list-style-type: none"> • The company has implemented specific actions regarding management of waste. <p>Guidance</p> <ul style="list-style-type: none"> • Examples of such measures include (but are not limited to): procedures to reuse or recycle waste, waste separation and waste sorting procedures, work process to optimize material consumption or to reduce waste, waste disposal arrangements etc. 	
✓	Energy audit or carbon assessment performed	<p>More Information</p> <ul style="list-style-type: none"> • The company has provided supporting documentation demonstrating that it has performed an energy audit or carbon assessment. <p>Guidance</p> <ul style="list-style-type: none"> • An energy audit is an inspection, survey and analysis of energy flows, within a building, process or system to reduce energy consumption. An energy audit is the first step in identifying opportunities to reduce energy expense and carbon footprints. • Carbon assessment or carbon footprint is a measure of the amount of CO2 or other GHG emissions of a defined process expressed as carbon dioxide equivalent and this can be done using a carbon footprint calculator. 	
✓	Formalized process in place to assess and document environmental risks	<p>More Information</p> <ul style="list-style-type: none"> • The company provides evidence in supporting documentation regarding the presence of a formalized process in place to assess and document environmental risks. <p>Guidance</p> <ul style="list-style-type: none"> • An environmental risk assessment is a formal process put in place to evaluate the probability and consequences of an environmental hazard occurring as well as setting up risk control measures to minimise and/or eliminate the latter. Risk management 'frameworks' have been developed in many organisations, to act as roadmaps for decision-makers. Such frameworks identify four main components of a risk assessment: (1) formulating the problem; (2) carrying out an assessment of the risk; (3) identifying and appraising the management options available; and (4) addressing the risk with the chosen strategy. Employers, managers and supervisors should all ensure that workplace practices reflect the risk management strategy. Supervisory checks and audits should be carried out to determine how well the aims set down are being achieved and corrective actions should be taken when required. 	
✓	Monitoring of pollutant concentrations into waste gas (e.g. VOC, heavy metals, NOx, SOx)	<p>More Information</p> <ul style="list-style-type: none"> • The company demonstrates that it has a procedure in place to continuously or intermittently monitor pollutant concentration from their waste gas through supporting documentation or questionnaire declaration. <p>Guidance</p> <ul style="list-style-type: none"> • Monitoring of pollutant concentration in exhaust gas is a way to determine the extent of air pollution generated by the company. This can be done on a continuous or intermittent basis through a range of instruments and laboratory analysis. By monitoring the pollutant concentration emitted to the atmosphere, an environmental impact assessment can be implemented and 	

Priority	Strength or Weakness	Additional Definition	CAP
		<p>subsequent measure to reduce the emissions can be implemented.</p> <ul style="list-style-type: none"> Emissions monitoring is an important part of air pollution control whereby emissions limits or guidelines must be abided. Monitoring can be a beyond-compliance measure for air pollution control, or it can be used to demonstrate compliance with regulatory or permit limits. Implementing a continuous emission monitoring system (CEMS), a sampling system, and using gas analyzers are all examples of effective pollution monitoring techniques. 	
✓	Measures to reduce energy consumption	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented specific measures to reduce the consumption of energy related to its activities. <p>Guidance</p> <ul style="list-style-type: none"> Examples might include selection of energy efficient equipment e.g. energy star office equipment, switching to LED lamps, improvement of building isolation. 	
✓	On-site wastewater treatment unit	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented a process to be able to treat waste water on site. <p>Guidance</p> <ul style="list-style-type: none"> Instead of discharging waste water from production without treatment, the company has implemented its own treatment station. Treated wastewater can then be re-used on site or discharged to the public sewage system. 	
✓	Measures to reduce paper consumption	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented specific measures to reduce the consumption of paper related to its activities. <p>Guidance</p> <ul style="list-style-type: none"> Examples might include provision of online catalogue to clients, distribution and storage of documents electronically (e.g. bills, press release, staff awareness on 'need to print', setting printers to double side). 	
✓	Measures to reduce noise at worksite/construction site	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented specific measures to reduce the noise related to operation of construction sites or worksites. Noise could come from tools or machinery (such as concrete breakers), use of explosives, delivery vehicles to name a few. <p>Guidance</p> <ul style="list-style-type: none"> Noise generated from construction activities could be a nuisance for the surrounding areas. Examples of measures might include selecting less noisy processes (e.g. block splitters instead of cut-off saws), using quiet equipment or fitting silencers to devices, and improving organisational practices such as restricting delivery to specific hours and interrupting the path of airborne noise by using noise enclosures or barriers. 	
✓	Employee awareness training on water management	<p>More Information</p> <ul style="list-style-type: none"> The company has a specific awareness (and training) program on reducing water consumption for employees. <p>Guidance</p> <ul style="list-style-type: none"> Awareness programs might include brochures given to employees, notices displayed in the workplace areas, presentation used during talks in order to engage employees on reduction of water consumption. Some examples of areas it could cover include turning off taps, selecting water efficient or water saving equipment (e.g. for facilities management or procurement department staff) and optimizing processes (e.g. change to waterless process, reducing the flow the water, re-use or recycle water). 	
✓	Waste heat recovery or combined heat & power system (CHP) in place	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented a process to be able to use heat from production processes to produce energy. 	

Priority	Strength or Weakness	Additional Definition	CAP
		<p>Guidance</p> <ul style="list-style-type: none"> • Cogeneration or combined heat and power (CHP) is a system that simultaneously generates at least two different forms of energy from a single fuel source. The electricity generator recovers and reuses its own waste heat from combustion of processed natural gas or petroleum gas, for example to generate steam that drives auxiliary turbines to produce additional power. 	
✓	Formal timeline defined to reduce consumption of hazardous substances		
✓	Eco-design measures to improve insulation of building		
✓	Reduction of energy consumption through innovative technologies	<p>More Information</p> <ul style="list-style-type: none"> • The company has implemented measures for reducing energy consumption. The measures can be a new process, a new facility feature, installation of energy efficient machinery, etc. <p>Guidance</p> <ul style="list-style-type: none"> • In order to reduce its energy consumption the company can select to modify its current arrangements by upgrading or changing the current equipment or technology in place and/or selecting processes that are more efficient. This is also possible at the design stage for new processes: the company selects an equipment or technology that would reduce energy consumption compared to the usual process implemented by their industry/sector peers. 	
✓	Monitoring of noise level	<p>More Information</p> <ul style="list-style-type: none"> • The company captures, analyses and reports the noise levels coming from its activities. <p>Guidance</p> <ul style="list-style-type: none"> • Noise generated from activities could be a nuisance for surrounding areas. The company should detect unacceptable noise impacts by implementing a monitoring program which would include some of these elements: Assessments at relevant locations to measure noise levels (e.g. at plant boundaries) at different frequencies according to the company activities (e.g. weekdays, during night shifts, heavy construction phases). Reporting on results (e.g. action level exceeded or not). 	
✓	Measures to optimize transport of employees or reduce CO2 emissions from transport	<p>More Information</p> <ul style="list-style-type: none"> • The company has implemented specific measures to optimize transportation or to reduce the amount of CO2 emissions related to transportation of employees. <p>Guidance</p> <ul style="list-style-type: none"> • Examples might include carpooling, bike programs, public transport incentive schemes, company vehicles using alternative energy, etc. 	
✓	Regular soil testing for heavy metal contamination	<p>More Information</p> <ul style="list-style-type: none"> • The company has provided supporting documentation demonstrating that it conducts regular soil testing for heavy metal contamination <p>Guidance</p> <ul style="list-style-type: none"> • Soil testing for metal contaminants is a continually evolving process aimed at improving the assessment of environmental and human health hazards associated with heavy metals in soils. The following heavy metals concentration are high in contaminated soil: lead, chromium, arsenic, zinc, cadmium, copper, mercury and nickel. • Remediation of heavy metal contaminated soils is necessary to reduce the associated risks, make the land resource available for agricultural production, enhance food security. 	
✓	Control of wastewater generated in finishing operations such as quenching and deburring	<p>More Information</p> <ul style="list-style-type: none"> • The company has implemented working processes that control the wastewater generated in finishing operations such as quenching and deburring. <p>Guidance</p> <ul style="list-style-type: none"> • It is important for companies to deal with water issues and 	

Priority	Strength or Weakness	Additional Definition	CAP
		impacts of their company's activities, including the emission of waste water. Certain sectors and activities will emit large amounts of wastewater from processes like quenching and deburring, which use water to cool materials and products during manufacturing. Companies can implement various actions in order to minimize wastewater, such as closed-loop water cooling systems, wastewater treatment installations on site, and steps to monitor water levels.	
✓	Company-specific emergency preparedness & response procedure	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented a procedure regarding the appropriate readiness and emergency response required to deal with crisis situations. <p>Guidance</p> <ul style="list-style-type: none"> A company specific emergency preparedness & response procedure might include elements related to evacuation plans, accidental spill procedures aimed at mitigating impact to the local environment, employees or consumers. 	
✓	Steps to detect and eliminate groundwater contamination	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented a working process that seeks to mitigate groundwater contamination through early detection. <p>Guidance</p> <ul style="list-style-type: none"> Examples of working processes might include regular testing of wastewater discharge, biological treatment and reverse osmosis treatments. 	
✓	Declares no asbestos used in any products, manufacturing processes or packaging (unverified)	<p>More Information</p> <ul style="list-style-type: none"> The company declares no asbestos used in any products, manufacturing processes or packaging and it's not verified. <p>Guidance</p> <ul style="list-style-type: none"> Asbestos used in any products, manufacturing processes or packaging can lead to cancer and cause other serious health effects. (U.S. Environmental Protection Agency). 	
✓	Measures to reuse or recycle waste	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented specific measures to reuse or recycle the waste produced. <p>Guidance</p> <ul style="list-style-type: none"> Examples of measures might include collecting and re-using the waste on site, sorting and ensuring the waste is collected by a specialist waste company. 	
✓	Measures to avoid emissions of dust or particles	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented specific measures to avoid emissions of dust or particles. <p>Guidance</p> <ul style="list-style-type: none"> Some examples of actions on this topic include (but are not limited to): emission control devices for drilling operations, covering stock piles of soil or sand with tarps to reduce fugitive dust emissions, training of employees on the proper handling of construction materials and dismantlement to reduce fugitive emissions. 	
✓	Production of renewable energy	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented a process to be able to produce renewable energy on its site. <p>Guidance</p> <ul style="list-style-type: none"> Examples of process and renewable energy are: setting up solar panels and producing solar energy, collecting and burning biomass/wood/waste to produce heat/hot water/steam. 	
✓	Infrastructures implemented to enable recycling of water	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented certain infrastructures to enable the recycling of water during operations. <p>Guidance</p> <ul style="list-style-type: none"> Examples might include the use of closed loop water systems, 	

Priority	Strength or Weakness	Additional Definition	CAP
		and systems to reclaim water or rainwater harvesting, or infrastructures to reuse process waste water.	
✓	Measures for handling hazardous substances	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented specific measures and concrete actions regarding hazardous materials management. <p>Guidance</p> <ul style="list-style-type: none"> Some potential examples of these measures might include, employee awareness or training programs on hazardous chemicals handling, formalized processes and documentation for transporting hazardous goods and chemicals and the use of safety checklists for safe storage and safe disposal of hazardous chemicals. 	
✓	Packaging designed for recyclability	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented measures at the design stage to ensure the packaging of its products can be recycled easily at the product end-of-life. <p>Guidance</p> <ul style="list-style-type: none"> Examples of measures available at the design stage are : material selection (e.g. recyclable, compostable, biodegradable materials and raw materials that will not interfere with existing recycling schemes), packaging structure (e.g. packaging parts that can be separated, restriction of over-packaging), improvement of existing packing materials (e.g. use of recycled materials), and switch to packaging that can be re-used or returned. 	
✓	Reduction of energy consumption through employee awareness programs	<p>More Information</p> <ul style="list-style-type: none"> The company has a specific awareness (and training) program for employees on reducing energy consumption. <p>Guidance</p> <ul style="list-style-type: none"> Awareness programs might include brochures given to employees, notices displayed in the workplace areas, presentation used during meetings in order to engage employees on reducing energy consumption. Some examples of areas it could cover include turning off lights at the end of the day, switching off electrical appliances when not in use, selecting energy-efficient equipment (e.g. for facilities management or procurement department staff), and optimizing machinery use (e.g. stand-by vs active for workshop operatives). 	

ENVIRONMENT:RESULTS

Priority	Strength or Weakness	Additional Definition	CAP
✓	Comprehensive reporting on environmental issues	<p>More Information</p> <ul style="list-style-type: none"> There is evidence of reporting implemented regarding environmental issues within the company supporting documentation, including key performance indicators (KPIs), statistical figures or associated concrete actions. The reporting covers the main issues and is regularly updated. <p>Guidance</p> <ul style="list-style-type: none"> The reporting covers the entity under evaluation (e.g. KPIs might be aggregate at group level). KPIs may include: direct energy consumption by primary energy source, total direct greenhouse gas emissions, total volume of water recycled and reused (Source: Global Reporting Initiative). Additionally, KPIs are reported in a formal public document available to stakeholders, and are in compliance with the Global Reporting Initiative guidelines or other external CSR reporting standards. Download the How-to Guide on this topic here (in English). 	
✓	CSR report follows GRI guidelines [GRI G4]	<p>More Information</p> <ul style="list-style-type: none"> The company has endorsed the Global Reporting Initiative (GRI) reporting guidelines. <p>Guidance</p>	

Priority	Strength or Weakness	Additional Definition	CAP
		<p>Additional Definition</p> <ul style="list-style-type: none"> GRI, the Global Reporting Initiative, provides the guideline for companies to disclose their environmental and social impacts in a standard reporting framework. Historical versions of the GRI were the G3 and G4 guidelines which were most recently superseded by the new 'GRI Standards' in October 2016. The GRI Standards are organized into a new structure and more flexible format. Companies declaring their reports "in accordance" with the GRI Standards can do so at a "Core" or "Comprehensive" level, depending on their coverage of topic-specific disclosures on material aspects. The level of reporting can be audited by a third party or can be self-declared. Companies can also simply reference the standards without reaching a specific core or comprehensive level. 	
	No information on the level of compliance with GRI guidelines	<p>More Information</p> <ul style="list-style-type: none"> No company declaration and no evidence within the supporting documentation of the compliance level with Global Reporting Initiative (GRI) guidelines. <p>Guidance</p> <ul style="list-style-type: none"> The Global Reporting Initiative (GRI), is an international standard for companies to disclose the results of their environmental and social impacts in a standardized reporting framework (Global Reporting Initiative). 	
	Less than 20% of water consumed is recycled or reused	<p>More Information</p> <ul style="list-style-type: none"> The company declares that less than 20% of water consumed is recycled or reused. <p>Guidance</p> <ul style="list-style-type: none"> Water recycling is the reuse of treated wastewater in processes or company operations. Wastewater recycling typically occurs on company premises, followed sequentially by the reuse of that wastewater in operations. By recycling water, companies can decrease the consumption of freshwater, as well as reduce the discharge of wastewater in sensitive areas close to fresh water bodies, etc. The relevant key performance indicator to monitor is the water recycling or reuse rate which measures the efficiency of water use, and demonstrates the ability of the company to reduce its total water consumption. 	
	Reporting on direct CO2 emissions	<p>More Information</p> <ul style="list-style-type: none"> The company has reported KPIs with regard to direct CO2 emissions either through formal documentation or questionnaire declaration. <p>Guidance</p> <ul style="list-style-type: none"> Direct CO2 emissions from fuel consumption include emissions from facilities, plants, properties or assets that are owned or controlled by the company (also referred to as Scope 1 emissions according to the GHG international protocol). Download the How-to Guide on this topic here (In English). 	
	Reporting on fossil fuel energy consumption	<p>More Information</p> <ul style="list-style-type: none"> The company has reported KPIs with regard to fossil fuel energy consumption either through formal documentation or questionnaire declaration. <p>Guidance</p> <ul style="list-style-type: none"> The company reports on fossil fuel energy consumption (oil, gas or coal, etc) from facilities, plants, property, vehicles or assets that are owned or controlled by the company. Examples of key performance indicators include total fossil fuel energy consumption, oil, gas or coal consumed per kg of product or per unit produced. 	
	Reporting on electricity consumption	<p>More Information</p> <ul style="list-style-type: none"> The company has reported KPIs with regard to electricity consumption either through formal documentation or questionnaire declaration. <p>Guidance</p> <ul style="list-style-type: none"> The company reports on electricity consumption from facilities, plants, property or assets that are owned or controlled by the 	

Priority	Strength or Weakness	Additional Definition	CAP
		company. <ul style="list-style-type: none">• Examples of key performance indicators include total electricity consumption, electricity consumed per kg of product or per unit produced.	

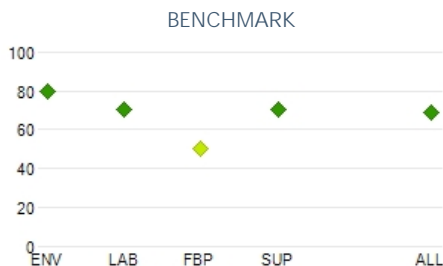
7. LABOR PRACTICES & HUMAN RIGHTS (LAB)

The labor theme takes into account **both Labor Practice** issues (e.g. health and safety, working conditions, etc.) and **Human Rights** issues (e.g. discrimination & harassment, child labor, etc.).

LABOR & HUMAN RIGHTS: SCORES

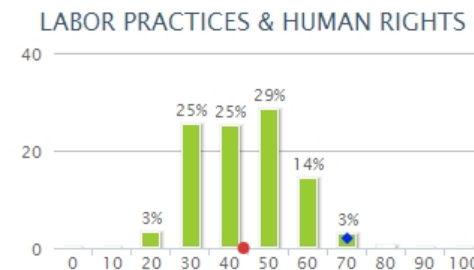
CSR PERFORMANCE	
Environnement	ENV 80 →
Social	LAB 70 →
Ethique des Affaires	FBP 50 ↗
Achats Responsables	SUP 70 →
WEIGHT of the Theme LAB	
4 out of 11 -> 36% of the global score	

Themes are weighted according the Corporate Social Responsibility (CSR) risks associated to the company industry of operation and country of operation(s). The theme weights influence the resulting overall score.



This benchmark shows the company overall score in comparison to the scores of industry sector peers on the EcoVadis platform. The top and bottom 5% of performers are excluded to ensure statistical relevance.

DETAILED SCORE BENCHMARK



The theme benchmark is a more detailed comparison of the company's theme score in comparison to other companies operating within the same industry. NOTE: Benchmark is only activated when they are at least 3 suppliers to compare with.

LABOR & HUMAN RIGHTS: ACTIVATED CRITERIA

Non activé Importance moyenne Importance haute Seulement dans les pays à risques

Note: Not all 21 criteria are activated for every company and some criteria have more weight than others in the overall assessment. The weights for the criteria are determined based on the CSR risks faced by the company according to their industry of operation and their country of operation(s).

LABOR & HUMAN RIGHTS: STRENGTH & WEAKNESSES



Note: The number of alert signs or checks next to a strength or weakness does not represent the performance of the company; rather they indicate the level of importance of each individual strength and/or weakness




This icon informs that the company has a Corrective Action Plan (CAP) in place associated to a particular weakness. The CAP is an interactive tool shared between suppliers and buyers. It helps to develop Actions to improve the supplier's CSR performance.


LABOR PRACTICES & HUMAN RIGHTS: POLICIES



Priority	Strength or Weakness	Additional Definition	CAP
✓	Standard policy on a majority of labor or human rights issues	<p>More Information</p> <ul style="list-style-type: none"> A standard labor and human rights policy includes commitments and/or operational objectives on the main labor and human rights risks the company faces. <p>Guidance</p> <ul style="list-style-type: none"> A comprehensive labor and human rights policy includes commitments and/or operational objectives on the majority of labor and human rights risks the company faces, and integrates quantitative objectives (i.e. targets) on those risks. It is also mandatory for the policy to incorporate some of the following elements: scope of application, allocation of responsibilities, and/or a formal review process. Policies are deemed exceptional when all labor practice and human rights issues are covered by qualitative and quantitative objectives, in addition to all of the aforementioned elements. Download the How-to Guide on this topic here (in English). 	
⚠	No supporting documentation or only basic policy on some relevant issues [i.e. child & forced labor]	<p>More Information</p> <ul style="list-style-type: none"> The company has either no supporting documentation on policies, or only provided evidence of basic policy statements that do not cover all the major labor practice & human rights issues the company is confronted with. <p>Guidance</p> <ul style="list-style-type: none"> A standard labor and human rights policy includes commitments and/or operational objectives on the main labor and human rights risks the company faces. It is communicated to internal and external stakeholders through a formal dedicated 	

Priority	Strength or Weakness	Additional Definition	CAP
		document. A standard labor and human rights policy contains qualitative objectives/commitments specific to those issues. The policy should also incorporate some of the following elements: scope of application, allocation of responsibilities, quantitative objectives, and review mechanisms. Download the How-to Guide on this topic here (in English).	
	No quantitative target on labor & human rights issues	<p>More Information</p> <ul style="list-style-type: none"> Company policy does not contain quantitative targets on labor and human rights issues. <p>Guidance</p> <ul style="list-style-type: none"> Quantitative objectives or targets on labor and human rights issues are considered as fundamental elements of comprehensive policy mechanism. They provide a monitoring framework that helps establish whether policy objectives are being met, and highlight the progress towards set goals. Some examples of specific targets on this topic include quantitative objectives on health & safety indicators (i.e. accident frequency and accident severity rates), quantitative objectives on percentage of employees trained on discrimination and quantitative objectives on number of employees covered by social benefits. As policy elements, targets can be expressed in absolute or relative terms and must have a valid future deadline (i.e. by 2020 we commit to train 100% of employees on discrimination). Download the How-to Guide on this topic here (in English). 	
	Global Compact signatory (at parent company level)	<p>More Information</p> <ul style="list-style-type: none"> The company's parent company is a Global Compact Signatory. <p>Guidance</p> <ul style="list-style-type: none"> The United Nations Global Compact (UNGC) is a voluntary initiative that encourages businesses worldwide to adopt sustainable and socially responsible policies, and to report on them. Global Compact participants commit to respecting 10 principles on human rights, labor rights, the environment and anti-corruption. The initiative has a mandatory disclosure framework, which obliges business participants to annually report on their progress against the 10 principles in a Communication on Progress (COP). Companies that do not comply with this reporting requirement are removed (or "delisted") from the list of participants after two years. 	

LABOR PRACTICES & HUMAN RIGHTS: ACTIONS

Priority	Strength or Weakness	Additional Definition	CAP
	Supporting documentation demonstrates a high level of coverage of labor and human rights actions throughout the company operations/workforce	<p>More Information</p> <ul style="list-style-type: none"> The assessed company has a large workforce (over 1000 employees). According to information in supporting documentation and our research, there is a high level of deployment of labor and human rights actions throughout the company (generally over 60% of workforce and/or operational sites are covered by actions). <p>Guidance</p> <ul style="list-style-type: none"> Companies that have a large employee base and/or more than one operational site shall demonstrate that their labor and human rights management system is deployed across all relevant sites. Operational sites within the assessment scope may include facilities such as manufacturing plants, offices, divisions, branches, and those of subsidiaries, across all the company's geographic locations. Some examples of evidence used to determine effective deployment of a labor and human rights management system's actions and certifications include (but are not limited to): - % of the total workforce across all locations represented in formal joint management-worker health & safety committees - % of the total workforce across all locations who are covered by formal 	

Priority	Strength or Weakness	Additional Definition	CAP
		collective agreements concerning working conditions - % of the total workforce across all locations who received regular performance and career development reviews - % of all operational sites that have been subject to human rights reviews or human rights impact assessments	
	No OHSAS 18001 certification	<p>More Information</p> <ul style="list-style-type: none"> The company declares no OHSAS 18001 certification and no certification was found in the supplier-provided and public documentation. <p>Guidance</p> <ul style="list-style-type: none"> OHSAS 18001 is an international standard for occupational health and safety management systems. It is intended to help an organizations to control occupational health and safety risks. It was developed in response to widespread demand for a recognized standard against which to be certified and assessed. The certification involves an external audit on the facilities' health & safety conditions. 	
	Internal audits on health & safety issues	<p>More Information</p> <ul style="list-style-type: none"> The company carries out internal audits on health & safety issues <p>Guidance</p> <ul style="list-style-type: none"> Internal audits of the operational health and safety management system are conducted in order to determine whether the management system complies with the functioning plan for health and safety management, with respect to legal requirements or to standards the company wishes to achieve beyond compliance. Internal audits are done to review and evaluate the performance and effectiveness of procedures in place, and are useful to expose gaps in the effective implementation of the health and safety management system. A typical internal audit programme, includes series of audits, is established for one year and covers all the relevant areas and activities stipulated by the audit criteria/requirements. 	
	Joint labor management health & safety committee in operation	<p>More Information</p> <ul style="list-style-type: none"> The company has a joint labor management health & safety committee in place <p>Guidance</p> <ul style="list-style-type: none"> It is important to have a committee in place composed of both workforce and management personnel dedicated to address the health and safety risks faced by employees (Source: International Labor Organization (ILO), 1929). These committees identify potential health and safety issues and offer timely and effective solutions to continuously improve workplace safety. Regular (monthly) inspections are recommended. For French companies, it is commonly known as the "Comité d'hygiène, de sécurité et des conditions de travail (CHSCT)" and it is mandatory for companies with more than 50 employees. 	
	Training of relevant employees on health & safety risks and best working practices	<p>More Information</p> <ul style="list-style-type: none"> The company provides training to relevant employees on health and safety risks and best working practices <p>Guidance</p> <ul style="list-style-type: none"> The company has implemented training on health and safety issues. Safety training aims at implementing health and safety procedures into specific job practices and at raising staff awareness and skills to an acceptable standard. For example, safety training covers topics such as accident prevention and safety promotion, safety compliance, use of personal protective equipment, chemical and hazardous materials safety, and workplace emergency response procedures. A best practice is to have a training matrix which helps to keep track of which employees have been trained, the date of the training, the training topic, and expected dates for refresher trainings. Monitoring of training attendance certificates is also suggested. 	

Priority	Strength or Weakness	Additional Definition	CAP
		<ul style="list-style-type: none"> It is also a best practice to have the training carried out in the language that the employees understand best and to carry out tests or quizzes to ensure training concepts have been successfully transmitted to participants. 	
	No information on measures regarding fundamental human rights [information available at parent company level only]	<p>More Information</p> <ul style="list-style-type: none"> No company declaration and no evidence within the supporting documentation on specific mechanisms or actions in place regarding fundamental human rights. <p>Guidance</p> <ul style="list-style-type: none"> Some examples of actions on this topic include awareness training on fundamental human rights, disciplinary measures and whistle blowing procedures, and formal engagements with local authorities on fundamental human rights issues. Fundamental human rights issues include (but are not limited to) some of the following: respect of security, property rights, employee privacy rights, rights to freedom of association and collective bargaining, and social and cultural rights (including indigenous rights), etc. 	
	Does not declare granting paid annual vacation throughout the entire scope of operations	<p>More Information</p> <ul style="list-style-type: none"> The company does not declare, in the questionnaire, granting paid annual vacation throughout for all its operations <p>Guidance</p> <ul style="list-style-type: none"> Annual leave is paid time off work granted by employers to employees to be used for whatever the employee wishes. Most countries around the world have labor laws that mandate employers give a certain number of paid time-off days per year to workers. 	
	No information on operational facilities SA8000 certified	<p>More Information</p> <ul style="list-style-type: none"> No company declaration and no evidence within the supporting documentation on SA 8000 certifications achieved for at least one of the company's operational sites. <p>Guidance</p> <ul style="list-style-type: none"> SA8000 is a sustainable standard for ensuring the empowerment and protection of the health and welfare of all personnel throughout a worksite and a company's supply chain, while providing a management system for employers to demonstrate and verify their compliance with the Standard. Since May 2015, SA8000: 2014 increases the organisation's social accountability responsibilities in managing its supply chain. SA8000 was developed to help ensure that employees globally are treated according to basic human rights principles. SA stands for Social Accountability and is run by Social Accountability International (SAI). SA8000 is based on the UN Universal Declaration of Human Rights, Convention on the Rights of the Child and various International Labour Organization (ILO) conventions. 	
	Collective agreement on discrimination and/or harassment		
	Collective agreement on training & career management		
	Collective agreement on working conditions		
	Whistleblower procedure on discrimination and/or harassment issues	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented a formal whistleblower procedure which encourages employees (and external stakeholders) to report potential violations of the company's discrimination and/or harassment policies. <p>Guidance</p> <ul style="list-style-type: none"> Employees can report on areas such as violations of the company's discrimination and/or harassment policy (e.g. on hiring, remuneration, training, promotion) through anonymous and secure communication channels. In addition, non-retaliation is ensured. 	
	Awareness training to prevent discrimination and/or harassment		

Priority	Strength or Weakness	Additional Definition	CAP
✓	Measures to promote a gender inclusive environment	<p>More Information</p> <ul style="list-style-type: none"> The company has specific measures to promote gender equality in the workplace <p>Guidance</p> <ul style="list-style-type: none"> The company promotes gender equality through specific measures like providing training on gender equality to management personnel. Gender equality is not only a fundamental human right, but a necessary foundation for a peaceful, prosperous and sustainable world. The 5th goal among the 17 UN Sustainable Development Goals is to achieve gender equality and empower all women and girls. 	
✓	Active measures for the prevention of musculoskeletal disorders	<p>More Information</p> <ul style="list-style-type: none"> The company actively implements measures to prevent musculoskeletal disorders <p>Guidance</p> <ul style="list-style-type: none"> Musculoskeletal Disorders or MSDs are injuries and disorders that negatively affect the human body's movement or musculoskeletal system (i.e. muscles, tendons, ligaments, nerves, discs, blood vessels, etc.). Some examples of how employees can suffer from MSDs occur when they are involved in high task repetition, forceful exertions and repetitive or sustained unnatural postures. Examples of measures to reduce MSDs are to train employees on a workplace ergonomics process and emphasizing early intervention (i.e. when risk factors are causing an employee to experience the early signs of MSDs, the company can remove the risk factors and help the employee return to 100% health with a proactive self-care program). 	
✓	Employee representatives or employee representative body (e.g. works council)	<p>More Information</p> <ul style="list-style-type: none"> The company has local employee representatives in place <p>Guidance</p> <ul style="list-style-type: none"> The company has elected local employee representatives. According to the Labor Relations Commission, employee representatives, are employees who have been formally designated by a trade union in accordance with the rules of that trade union and who normally participate in negotiations about terms and conditions of employment for all or a section of the workforce and who are involved in the procedures for the settlement of any disputes or grievances which may arise. The main duties of an employee representative include representing members fairly and effectively, participating in negotiation and grievance procedures as stipulated by employer/trade union agreements, and co-operating with the management in ensuring the proper implementation and observance of employer/trade union agreements, among others. 	
✓	External audits on health & safety issues	<p>More Information</p> <ul style="list-style-type: none"> External audits on health & safety issues are carried out on the company premises <p>Guidance</p> <ul style="list-style-type: none"> Audits of the operational health and safety management system are conducted by an external third party in order to determine whether the management system complies with legal requirements or specific standards the company wishes to adhere to. External audits are done to review and evaluate the performance and effectiveness of procedures in place, and are useful to expose gaps in the effective implementation of the health and safety management system. 	
✓	Company profit-sharing plan	<p>More Information</p>	

Priority	Strength or Weakness	Additional Definition	CAP
		<ul style="list-style-type: none"> The company has implemented a profit sharing plan for employees. <p>Guidance</p> <ul style="list-style-type: none"> A profit sharing plan is an incentive plan which provides direct or indirect payments to employees that depend on the company's profitability in addition to employees' regular salary and bonuses. These plans typically amount to allocation of shares to employees. The profit sharing plans are based on predetermined economic sharing rules that define the split of gains between the company as a principal and the employee as an agent. 	
✓	Official measures to promote work-life balance	<p>More Information</p> <ul style="list-style-type: none"> The company has official measures to promote work-life balance in place, and which have been found within the supporting documentation <p>Guidance</p> <ul style="list-style-type: none"> The company implements measures to help reconcile work, private and family life whereby it promotes opportunities for workers to achieve a healthy balance between their professional and personal lives. Achieving work-life balance can be made easier by family-oriented policies such as social benefits, employment-protected leave for parents and affordable formal arrangements for family care. Flexibility in the organization of work (part-time work, flexible working times and telework) can also enhance work-life balances. 	
✓	Employee health & safety detailed risk assessment	<p>More Information</p> <ul style="list-style-type: none"> The company carries out employee health & safety detailed risk assessments <p>Guidance</p> <ul style="list-style-type: none"> The company has carried out detailed risk assessment of health and safety. Occupational health and safety risk assessments are a crucial step in the prevention process. They involve the identification of all the potential hazards an employee may face while carrying out regular duties and which type of employees may be more exposed to hazards (by job function). The level of risk, records of significant findings and proposition of preventive actions are also highlighted, in addition to plans for regular review of the risk assessment. If applicable, the results of a health and safety risk assessment should be made available to relevant stakeholders such as employees, members of the health and safety committee, staff representatives, the occupational physicians, and labor inspectors. 	
✓	Provision of working conditions and infrastructure to accommodate employees with disabilities		
✓	Awareness training to prevent child and forced labor		
✓	Regular assessment (at least once a year) of individual performance	<p>More Information</p> <ul style="list-style-type: none"> The company carries out regular assessments or appraisal of individual performance at least on a yearly basis for employees <p>Guidance</p> <ul style="list-style-type: none"> The company has implemented regular assessment of employee performance. Regular assessments of employees aim to evaluate employee individual performance and productivity, combining both written and oral elements, and are based on a systematic and periodic process linked with a pre-established criteria and organizational objectives. The best practice concerning this criteria is to have a review with the employee at least annually, and to include employee self-assessments aimed at maintaining employee engagement in their own performance and overall organizational objectives. Setting and measuring goals related to the employee's career objectives, as well as including manager and peer feedback on the employee's performance are all important components in this 	

Priority	Strength or Weakness	Additional Definition	CAP
		regular assessment process.	
✓	Company specific health care program for employees	<p>More Information</p> <ul style="list-style-type: none"> • The company provides a health care program for employees <p>Guidance</p> <ul style="list-style-type: none"> • The company offers health care benefits to its employees. Health care plans are one of the most desirable employee benefits in most countries. Typically, health insurance plans cover a range of general medical and surgical expenses incurred by employees for a wide array of procedures and health services. There are different ways that companies allocate this benefit to their employees like an indemnity plan, managed care, etc. • Some examples of areas that a health care plan could cover include, but are not limited to: health assessments, dental coverage, eye coverage, surgical procedures, cancer treatments and treatment of conditions relating to alcohol and substance abuse. 	
✓	Interactive session with employees regarding working conditions	<p>More Information</p> <ul style="list-style-type: none"> • The company has an interactive communication session with employees on working conditions. <p>Guidance</p> <ul style="list-style-type: none"> • Interactive communication strategies help companies to receive input and feedback. This assists companies in effectively running their business and helps eliminate or reduce workplace mistakes, oversights and inter-office conflict. Proactive strategies can include creating a discussion agenda, communication policies and structured workshops between employees and management. 	
✓	Active preventive measures for stress and noise	<p>More Information</p> <ul style="list-style-type: none"> • The company has preventive measures in place against stress and noise <p>Guidance</p> <ul style="list-style-type: none"> • The company has measures in place to monitor, prevent and report on noise level and to control the stress level of employees within the company premises. • Noise-induced hearing loss is one of the most prominent and most recognised occupational diseases in the Member States of the European Union. Typical sectors for workers exposed to loud noises include construction, agriculture, forestry, manufacturing of metal and wood, mining and quarrying. • The definition of stress used by Health and Safety Executive (HSE), namely "the adverse reaction people have to excessive pressures or other types of demand placed on them." Work-related stress can be caused by poor work design (for example, lack of control over work processes), poor management, unsatisfactory working conditions, and a lack of support from colleagues and supervisors. • Some examples of measures to reduce stress include: provision of appropriate employee support services, conducting stress risk assessments, ensuring that employees are appropriately trained to fulfill their roles, monitoring working hours and overtime, ensuring that employees take their full holiday entitlement, and offering appropriate support to employees who are experiencing stress outside of work. 	
✓	Mandatory health check-up for employees	<p>More Information</p> <ul style="list-style-type: none"> • The company provides general mandatory health check-up for employees <p>Guidance</p> <ul style="list-style-type: none"> • The company carries out mandatory health check-up for its employees. Within the scope of health check ups, the mental and physical states of employees are investigated to ascertain the status of the employee's health related to the job function, and in particular to identify any negative work-related effects on employees. • According to the International Labor Organization (ILO), it is 	

Priority	Strength or Weakness	Additional Definition	CAP
		recommended that a health check up for employees is carried out within thirty days from the first day the employee is employed and the subsequent health check up conducted at least once a year by a licensed medical practitioner, especially for manufacturing companies presenting high health and safety risks for employees.	
✓	Specific procedures for handling of chemicals or hazardous substances	<p>More Information</p> <ul style="list-style-type: none"> • The company has implemented specific procedures to handle chemicals or hazardous substances within their scope of operations <p>Guidance</p> <ul style="list-style-type: none"> • A 'hazardous substance' is any substance that has one or more of the following intrinsic 'hazardous properties': explosiveness, flammability, ability to oxidize (accelerate a fire), human toxicity (acute or chronic), corrosiveness (to human tissue or metal), ecotoxicity (with or without bioaccumulation), and capacity, on contact with air or water, to develop one or more of the above properties. In the Control of Substances Hazardous to Health Regulations 2002 (COSHH), for example, hazardous substances are those substances classified as toxic, very toxic, corrosive, harmful or irritant. • The company has one or more procedures in place addressing how to safely manage the risks associated with hazardous substances and chemicals in the workplace. These procedures may include, but are not limited to: instructions on how employees should safely use, handle and store hazardous substances in varying quantities as well as safe mixing procedures. 	
✓	Official measures promoting career mobility	<p>More Information</p> <ul style="list-style-type: none"> • The company has implemented measures to promote internal mobility for employees. <p>Guidance</p> <ul style="list-style-type: none"> • The company has a process in place to promote internal mobility for employees. Career mobility refers to the movement of employees across positions/paygrades or a complete change in job function (i.e. horizontal career mobility) within the same organization. • Some examples of measures promoting internal career mobility include, but are not limited to: objectively promoting talent based on ability and potential, developing roadmaps for key talent in the company, continuing professional training, and encouraging employees to broaden their range of skills. 	
✓	Provision of skills development training	<p>More Information</p> <ul style="list-style-type: none"> • The company provides training to its employees to develop their skills <p>Guidance</p> <ul style="list-style-type: none"> • The company has implemented vocational training and instruction, which include skills development training, education paid for in whole or in part by the company, with the goal to provide opportunities for career advancement (Source: Global Reporting Initiative G3). • Examples of on-the-job training to enhance employee skills are coaching, mentoring, job rotation, apprenticeships, etc. • Total number of hours of training per employee per year can be a significant key performance indicator for this action. 	
✓	Structured social dialogue measures in place (e.g. collective agreement)	<p>More Information</p> <ul style="list-style-type: none"> • The company has implemented structured social dialogue measures (e.g. collective agreements) <p>Guidance</p> <ul style="list-style-type: none"> • A collective bargaining agreement is the result of negotiations between an employer/employer's organization on the one hand and one or more worker's organizations (i.e. trade unions) on the other hand, determining working conditions and terms of employment (Source: ILO Convention No. 154). 	

Priority	Strength or Weakness	Additional Definition	CAP
		<ul style="list-style-type: none"> The terms and conditions of employment and/or the provisions regarding rates of pay, hours of work and other working conditions set forth by the collective bargaining agreement are binding to both parties, and therefore cannot be contradicted by stipulations in other contracts of employment. (Source: International Labor Organization (ILO)) 	

LABOR PRACTICES & HUMAN RIGHTS:RESULTS

Priority	Strength or Weakness	Additional Definition	CAP
✓	Comprehensive reporting on labor practices & human rights issues	<p>More Information</p> <ul style="list-style-type: none"> There is evidence of reporting implemented regarding labor practices & human rights issues within the company supporting documentation, including key performance indicators (KPIs), statistical figures or associated concrete actions. The reporting covers the main issues and is regularly updated. <p>Guidance</p> <ul style="list-style-type: none"> The reporting covers the entity under evaluation (e.g. KPIs might be aggregate at group level). KPIs may include (but are not limited to): accident frequency and severity rates, the percentage of employees covered by collective bargaining agreements, skills development trainings, and percentage of employees trained on discrimination issues. Additionally, KPIs are reported in a formal public document available to stakeholders, and are in compliance with the Global Reporting Initiative guidelines or other external CSR reporting standards. Download the How-to Guide on this topic here (in English). 	
✓	Reporting on average hours of safety training	<p>More Information</p> <ul style="list-style-type: none"> The company reports, either through formal documentation or questionnaire declaration, on the average number of hours of safety training delivered per year and per employee. <p>Guidance</p> <ul style="list-style-type: none"> Safety training aims at implementing health and safety procedures into specific job practices and at raising staff awareness and skills to an acceptable standard. Such training covers topics like proper use of personal protective equipment, handling of materials or chemicals, identifying and assessing hazards, ergonomics, work-related stress, noise exposure, driver training, etc. Safety training can be done on an annual or periodic basis via online or in-person training sessions. Refresher trainings can also be carried out for employees. 	
✓	Reporting on accident severity rate	<p>More Information</p> <ul style="list-style-type: none"> The company reports, either through formal documentation or questionnaire declaration, on the accident severity rate among its employees for the last reporting year. <p>Guidance</p> <ul style="list-style-type: none"> The accident severity rate (or Lost Time Injury Severity Rate) measures the time lost due to occupational injuries in relation to the total amount of time worked. It indicates how severe the accidents were and how long the injured employees were out of work as a result of disabling injuries. The calculation method varies from country to country; for instance in the way lost time injury events are determined or what baseline is used to calculate the rate. In the UK it is calculated as follows: [(number of days lost due to injuries) x 200,000/total hours worked], whereas in France it is: [(number of days lost due to injuries) x 1000/total hours worked]. In India, the rate is calculated as [(number of days lost due to injuries) x 1,000,000/total hours worked]. Download the How-to Guide on this topic here (in English). 	
✓	Reporting on accident frequency rate	<p>More Information</p> <ul style="list-style-type: none"> The company reports, either through formal documentation or questionnaire declaration, on the accident frequency rate among its employees for the last reporting year. <p>Guidance</p> <ul style="list-style-type: none"> The accident frequency rate (or the lost time injury frequency rate) measures the number of lost time injuries in relation to the 	

Priority	Strength or Weakness	Additional Definition	CAP
		<p>total number of hours worked by employees. It indicates the extent to which injury accidents are repeated over time and their number of occurrence.</p> <ul style="list-style-type: none"> • The calculation method varies from country to country, depending for instance on the way lost time injury events are determined or the baseline used to calculate the rate. In the UK it is calculated as follows: [(total number of lost time injury events) x 100,000/total hours worked], whereas in USA it is: [(total number of lost time injury events) x 200,000/total hours worked)]. In France or Japan, the rate is calculated as [(total number of lost time injury events) x 1,000,000/total hours worked)] Download the How-to Guide on this topic here (in English). 	
✓	CSR report follows GRI guidelines [GRI G4]	<p>More Information</p> <ul style="list-style-type: none"> • The company has endorsed the Global Reporting Initiative (GRI) reporting guidelines. <p>Guidance</p> <ul style="list-style-type: none"> • GRI, the Global Reporting Initiative, provides the guideline for companies to disclose their environmental and social impacts in a standard reporting framework. Historical versions of the GRI were the G3 and G4 guidelines which were most recently superseded by the new 'GRI Standards' in October 2016. The GRI Standards are organized into a new structure and more flexible format. Companies declaring their reports "in accordance" with the GRI Standards can do so at a "Core" or "Comprehensive" level, depending on their coverage of topic-specific disclosures on material aspects. The level of reporting can be audited by a third party or can be self-declared. Companies can also simply reference the standards without reaching a specific core or comprehensive level. 	
	No information on the level of compliance with GRI guidelines	<p>More Information</p> <ul style="list-style-type: none"> • No company declaration and no evidence within the supporting documentation of the compliance level with Global Reporting Initiative (GRI) guidelines. <p>Guidance</p> <ul style="list-style-type: none"> • The Global Reporting Initiative (GRI), is an international standard for companies to disclose the results of their environmental and social impacts in a standardized reporting framework (Global Reporting Initiative). 	
✓	Reporting on percentage of women in executive positions (e.g. senior or top management)	<p>More Information</p> <ul style="list-style-type: none"> • The company reports, either through formal documentation or questionnaire declaration, on the percentage of women in executive positions (e.g. senior or top management). <p>Guidance</p> <ul style="list-style-type: none"> • Executive positions include positions such as chief financial officers, chief operating officers, or any other key roles in a company. The aim is to look into whether a company is promoting an increase in gender diversity in its executive rank or not. It is important to note that in 2015, only 14.2% of the top five leadership positions in companies in the S&P500 are held by women according to CNNMoney analysis. 	

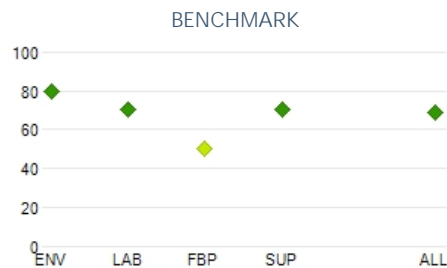
8. FAIR BUSINESS PRACTICES (FBP)

The fair business practice theme focuses primarily **on corruption and bribery issues**, but also takes into account anti-competition and responsible information management depending on the industry of operation.

FAIR BUSINESS PRACTICES: SCORES

CSR PERFORMANCE	
Environnement	ENV 80 →
Social	LAB 70 →
Ethique des Affaires	FBP 50 ↗
Achats Responsables	SUP 70 →
WEIGHT of the Theme FB	
2 out of 11 -> 18% of the global score	

Themes are weighted according the Corporate Social Responsibility (CSR) risks associated to the company industry of operation and country of operation(s). The theme weights influence the resulting overall score.



This benchmark shows the company overall score in comparison to the scores of industry sector peers on the EcoVadis platform. The top and bottom 5% of performers are excluded to ensure statistical relevance.

DETAILED SCORE BENCHMARK



The theme benchmark is a more detailed comparison of the company's theme score in comparison to other companies operating within the same industry. NOTE: Benchmark is only activated when they are at least 3 suppliers to compare with.

FAIR BUSINESS PRACTICES: ACTIVATED CRITERIA

Non activé Importance moyenne Importance haute Seulement dans les pays à risques

Note: Not all 21 criteria are activated for every company and some criteria have more weight than others in the overall assessment. The weights for the criteria are determined based on the CSR risks faced by the company according to their industry of operation and their country of operation(s).

FAIR BUSINESS PRACTICES: STRENGTH & WEAKNESSES

Note: The number of alert signs or checks next to a strength or weakness does not represent the performance of the company; rather they indicate the level of importance of each individual strength and/or weakness






This icon informs that the company has a Corrective Action Plan (CAP) in place associated to a particular weakness. The CAP is an interactive tool shared between suppliers and buyers. It helps to develop Actions to improve the supplier's CSR performance.

FAIR BUSINESS PRACTICES:POLICIES

Priority	Strength or Weakness	Additional Definition	CAP
✓	Quantitative objectives set on some relevant issues [i.e. business ethic issues]	<p>More Information</p> <ul style="list-style-type: none"> The company has defined and has formally communicated quantitative objectives (i.e. targets) with regard to the relevant fair business practices objectives. <p>Guidance</p> <ul style="list-style-type: none"> Quantitative objectives or targets on fair business practices issues are considered as fundamental elements of comprehensive policy mechanism. They provide a monitoring framework that helps establish whether policy objectives are being met, and highlight the progress towards set goals. Some examples of specific targets on this topic include quantitative objectives on the percentages of employees to receive training on anti-corruption practices or anti-competitive practices. As policy elements, targets can be expressed in absolute or relative terms and must have a valid future deadline. 	
✓	Comprehensive policies on business ethics issues	<p>More Information</p> <ul style="list-style-type: none"> A comprehensive policy on business ethics issues integrates commitments and/or operational objectives on all or almost all of the main fair business practices issues a company is confronted with: namely corruption & bribery issues, and information security and responsible marketing if applicable. It is also compulsory to have additional elements such as formal mechanism to communicate on business ethics, scope of the policy's application and allocation of responsibilities, among others. <p>Guidance</p> <ul style="list-style-type: none"> Policies are deemed exceptional when all business ethics issues are covered by qualitative and quantitative objectives. Additionally, an exceptional policy has exhaustive organizational elements such as allocation of responsibilities, mechanisms to deal with policy violations, formal review process, communication of the policy to all employees and business partners, etc. Download the How-to Guide on this topic here (in English). 	
✓	Disciplinary sanctions to deal with policy violations	<p>More Information</p> <ul style="list-style-type: none"> There is evidence within the supporting documentation provided that the company has implemented structured mechanisms to deal with policy violations such as disciplinary actions. <p>Guidance</p> <ul style="list-style-type: none"> In order to ensure the adequate implementation of business ethics policies, companies should establish procedures to administer investigations and sanction employees for eventual violations (i.e. disciplinary measures up to and including possible termination). 	
✓	Dedicated responsibility for business ethics issues		
✓	Global Compact signatory (at parent company level)	<p>More Information</p> <ul style="list-style-type: none"> The company's parent company is a Global Compact Signatory. <p>Guidance</p> <ul style="list-style-type: none"> The United Nations Global Compact (UNGC) is a voluntary initiative that encourages businesses worldwide to adopt sustainable and socially responsible policies, and to report on them. Global Compact participants commit to respecting 10 principles on human rights, labor rights, the environment and anti-corruption. The initiative has a mandatory disclosure framework, which obliges business participants to annually report on their progress against the 10 principles in a Communication on Progress (COP). Companies that do not comply with this reporting requirement are removed (or "delisted") from the list of participants after two years. 	





FAIR BUSINESS PRACTICES:ACTIONS

Priority	Strength or Weakness	Additional Definition	CAP
----------	----------------------	-----------------------	-----

Priority	Strength or Weakness	Additional Definition	CAP
	Supporting documentation demonstrates a medium level of coverage of business ethics actions throughout the company operations	<p>More Information</p> <ul style="list-style-type: none"> The assessed company has a large workforce (over 1000 employees). According to information in supporting documentation and our research, there is a medium level of deployment of business ethics actions throughout the company (generally between 20% and 60% of workforce and/or operational sites are covered by actions). <p>Guidance</p> <ul style="list-style-type: none"> Companies that have a large employee base and/or more than one operational site shall demonstrate that their business ethics management system is deployed across all relevant sites. Operational sites within the assessment scope may include facilities such as manufacturing plants, offices, divisions, branches, and those of subsidiaries, across all the company's geographic locations. Some examples of evidence used to determine effective deployment of a business ethics management system's actions and certifications include (but are not limited to): - % of the total workforce across all locations who received training (e.g. e-learning) on business ethics issues - % of all operational sites for which an internal audit/risk assessment concerning business ethics issues has been conducted - % of all operational sites with an information security management system (ISMS) certified to ISO 27000 (or other equivalent/similar standard) - % of all operational sites with a certified anti-corruption management system 	
	Whistleblower procedure to report business ethics issues		
	Awareness training on business ethics issues		
	No supporting documentation regarding corruption and bribery risk analysis performed		
	No supporting documentation regarding audits of control procedures to prevent information security breaches		
	No supporting documentation regarding audits of control procedures to prevent corruption and bribery		
	Provision of competitor interaction guidelines to key employees		
	Specific procedures for retaining and using third-party intermediaries (i.e. due diligence, certifications)	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented systematic compliance and due-diligence measures when dealing with third-party intermediaries (i.e. commission agents, brokers, sales representatives, distributors, contractors, customs brokers, consultants) acting on its behalf. <p>Guidance</p> <ul style="list-style-type: none"> Risk assessments on the environment vary according to sector risks, but can include handling of hazardous materials. 	
	Specific approval procedure for sensitive transactions (e.g. gifts, travel)	<p>More Information</p> <ul style="list-style-type: none"> The company has implemented a verification process for sensitive transactions. <p>Guidance</p> <ul style="list-style-type: none"> Sensitive transactions involve payments and cash transfers particularly for operations exposed to high risk of corruption and bribery. Some examples are: gifts, entertainment and travel, new investments. 	
	Audits of control procedures to prevent anti-competitive practices	<p>More Information</p> <ul style="list-style-type: none"> The company's fair competition policies and compliance mechanisms are regularly audited. <p>Guidance</p> <ul style="list-style-type: none"> An internal audit team is responsible for regularly controlling the compliance with the fair competition policy of the various company entities, and the effectiveness of the company's 	

Priority	Strength or Weakness	Additional Definition	CAP
		management system.	

FAIR BUSINESS PRACTICES:RESULTS

Priority	Strength or Weakness	Additional Definition	CAP
	Our 360° screening has identified at least one significant controversy, fine or penalty regarding business ethics issues (e.g. corruption, anti-competitive practices, data confidentiality) in the last ten years (see news flagged with red warning sign in the 360° section) [severe fine for price fixing]	<p>More Information</p> <ul style="list-style-type: none"> Major allegations, condemnations, fines or controversies have been reported in the last 10 years by stakeholder representatives (e.g. NGOs, trade unions, press, international organizations) directly exposing the company regarding its business ethics. <p>Guidance</p> <ul style="list-style-type: none"> The EcoVadis "360° Watch" has searched over 800+ stakeholder sources (e.g. NGOs, trade unions, governments, press), looking for external views on the company's CSR approach and impacts. A major allegation, condemnation, fine or controversy on business ethics issues either involving the company under evaluation or one of its subsidiaries has been reported in the last 10 years. 	
	Standard reporting on business ethics issues	<p>More Information</p> <ul style="list-style-type: none"> The company reports, either through formal documentation or questionnaire declaration, on fair business practices including key performance indicators (KPIs), statistical figures or associated concrete actions. <p>Guidance</p> <ul style="list-style-type: none"> Reporting is considered standard when relevant and meaningful KPIs cover the main fair business practices issues (i.e. corruption & bribery and optionally anti-competitive practices issues and consumer/client issues such as responsible marketing & data protection), when KPIs are recent (i.e. last 2 reporting years) and regularly updated. KPIs can be sector-specific and include for instance the % of employees trained on business ethics issues, number of breaches of the Code of Ethics, and number of incidents reported through the whistle blowing procedure. Comprehensive reporting on business ethics issues will additionally have KPIs reported in a formal public document available to stakeholders, and will be aligned with external CSR reporting standards or guidelines such as the Global Reporting Initiative. Download the How-to Guide on this topic here (in English). 	
	CSR report follows GRI guidelines [GRI G4]	<p>More Information</p> <ul style="list-style-type: none"> The company has endorsed the Global Reporting Initiative (GRI) reporting guidelines. <p>Guidance</p> <ul style="list-style-type: none"> GRI, the Global Reporting Initiative, provides the guideline for companies to disclose their environmental and social impacts in a standard reporting framework. Historical versions of the GRI were the G3 and G4 guidelines which were most recently superseded by the new 'GRI Standards' in October 2016. The GRI Standards are organized into a new structure and more flexible format. Companies declaring their reports "in accordance" with the GRI Standards can do so at a "Core" or "Comprehensive" level, depending on their coverage of topic-specific disclosures on material aspects. The level of reporting can be audited by a third party or can be self-declared. Companies can also simply reference the standards without reaching a specific core or comprehensive level. 	
	No information on the level of compliance with GRI guidelines	<p>More Information</p> <ul style="list-style-type: none"> No company declaration and no evidence within the supporting documentation of the compliance level with Global Reporting Initiative (GRI) guidelines. <p>Guidance</p> <ul style="list-style-type: none"> The Global Reporting Initiative (GRI), is an international standard for companies to disclose the results of their environmental and social impacts in a standardized reporting framework (Global Reporting Initiative). 	

9. SUSTAINABLE PROCUREMENT (SUP)

The sustainable procurement theme focuses on both social and environmental issues **within the company supply chain**.

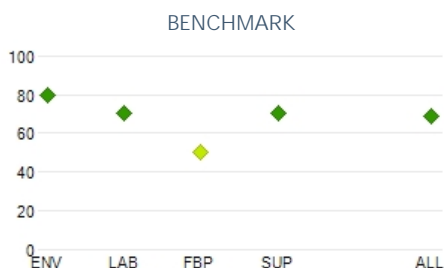
SUSTAINABLE PROCUREMENT: SCORES

CSR PERFORMANCE	
Environnement	ENV 80 →
Social	LAB 70 →
Ethique des Affaires	FBP 50 ↗
Achats Responsables	SUP 70 →

WEIGHT of the Theme SUP

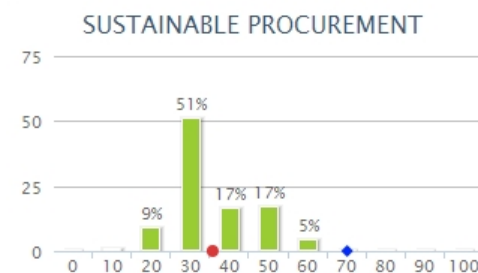
2 out of 11 -> 18% of the global score

Themes are weighted according to the Corporate Social Responsibility (CSR) risks associated to the company industry of operation and country of operation(s). The theme weights influence the resulting overall score.



This benchmark shows the company overall score in comparison to the scores of industry sector peers on the EcoVadis platform. The top and bottom 5% of performers are excluded to ensure statistical relevance.

DETAILED SCORE BENCHMARK



The theme benchmark is a more detailed comparison of the company's theme score in comparison to other companies operating within the same industry. NOTE: Benchmark is only activated when they are at least 3 suppliers to compare with.

SUSTAINABLE PROCUREMENT: ACTIVATED CRITERIA

Non activé Importance moyenne Importance haute Seulement dans les pays à risques

Note: Not all 21 criteria are activated for every company and some criteria have more weight than others in the overall assessment. The weights for the criteria are determined based on the CSR risks faced by the company according to their industry of operation and their country of operation(s).

SUSTAINABLE PROCUREMENT: STRENGTH & WEAKNESSES

Note: The number of alert signs or checks next to a strength or weakness does not represent the performance of the company; rather they indicate the level of importance of each individual strength and/or weakness



This icon informs that the company has a Corrective Action Plan (CAP) in place associated to a particular weakness. The CAP is an interactive tool shared between suppliers and buyers. It helps to develop Actions to improve the supplier's CSR performance.

SUSTAINABLE PROCUREMENT: POLICIES

Priority	Strength or Weakness	Additional Definition	CAP
✓	Comprehensive sustainable procurement policies on both social and environmental factors	<p>More Information</p> <ul style="list-style-type: none"> The company has issued a comprehensive policy that integrates commitments, qualitative and quantitative objectives on the management of its sustainable procurement issues. <p>Guidance</p> <ul style="list-style-type: none"> The existing policy covers both environmental and social issues that the company may impact through its procurement strategy. Policies are deemed exceptional when they integrate not only qualitative but also quantitative operational objectives on all material sourcing risks the company faces, in addition to the following organizational elements: regular review mechanisms, a scope of application, the allocation of responsibilities, and communication of the policy to all stakeholders. Download the How-to Guide on this topic here (in English). 	
✓	Endorsement of the French Charter for Responsible Supplier Relationship		

SUSTAINABLE PROCUREMENT: ACTIONS

Priority	Strength or Weakness	Additional Definition	CAP
✓	Supporting documentation demonstrates a high level of coverage of sustainable procurement actions throughout the company supplier base/operations	<p>More Information</p> <ul style="list-style-type: none"> According to information in supporting documentation and our research, there is a high level of deployment of sustainable procurement throughout the company (generally over 60% of supplier base are covered by actions). <p>Guidance</p> <ul style="list-style-type: none"> Companies shall demonstrate that their sustainable 	

Priority	Strength or Weakness	Additional Definition	CAP
		<p>procurement management system is deployed across its buyers and supplier base.</p> <ul style="list-style-type: none"> • The buyers within the assessment scope may include those associated to operational sites including facilities such as manufacturing plants, offices, divisions, branches, and those of subsidiaries, across all the company's geographic locations. • The supplier base may include all providers of products and services to the assessment scope, encompassing any level of risk and/or spend. • Some examples of evidence used to determine effective deployment of a sustainable procurement management system's actions and certifications include (but are not limited to): - % of all suppliers who have signed the sustainable procurement charter/supplier code of conduct - % of all supplier contracts that include clauses on environmental, labor, human rights, and ethical requirements - % of all buyers across all locations who received training on sustainable procurement - % of all suppliers which has gone through a CSR assessment (e.g. questionnaire) - % of all suppliers which has gone through a CSR on-site audit 	
✓	Supplier CSR code of conduct in place	<p>More Information</p> <ul style="list-style-type: none"> • The company has issued a specific Supplier Code of Conduct which lists the minimum requirements on environmental, labor and business ethics issues to be followed by its suppliers or subcontractors. <p>Guidance</p> <ul style="list-style-type: none"> • A supplier Code of Conduct aims to ensure that suppliers provide safe working conditions for their employees, respect fair business ethics practices to comply with rules and regulations and reduce environmental impacts caused by their operations, among other issues. Typically, suppliers are required to uphold the standards in a Code of Conduct in order to continue in a business relationship with their client (i.e. the company undergoing the EcoVadis evaluation). 	
✓	Formal assessment of suppliers' progress with regards to REACH requirements	<p>More Information</p> <ul style="list-style-type: none"> • There is some evidence of formal reporting on concrete actions or measures implemented regarding supplier compliance with the European REACH regulation. <p>Guidance</p> <ul style="list-style-type: none"> • REACH (Registration, Evaluation and Authorisation of Chemicals) is a regulation from the European Union that addresses the production and use of chemical substances and their potential impacts on both human health and the environment. It requires all companies manufacturing or importing chemical substances into the European Union in quantities of one tonne or more per year to register these substances to the European Chemicals Agency (ECHA) in Helsinki, Finland. 	
✓	On-site audits of suppliers on environmental or social issues	<p>More Information</p> <ul style="list-style-type: none"> • The company's supporting documentation demonstrates evidence of on-site supplier audits on environmental and/ or social issues through audit reports or third party audit certificates. <p>Guidance</p> <ul style="list-style-type: none"> • Evidence of internal/external on site audits is recent enough (i.e. less than 12 months). • Audits can be announced or unannounced and are systematically conducted at least for suppliers most exposed to CSR risks. • External audits are carried out by credible third party auditors and recognized environmental and/or social auditing standards are utilized (e.g. SMETA, EICC). • Audits are directly conducted via field visits, i.e. on the suppliers' operational sites and/or business premises. 	

Priority	Strength or Weakness	Additional Definition	CAP
✓	Regular supplier assessment (e.g. questionnaire) on environmental or social practices	<p>More Information</p> <ul style="list-style-type: none"> The company provides evidence in supporting documentation of supplier assessments (in-house, 3rd party, or self-assessments) on environmental (including regulatory issues), social and/or ethical issues. <p>Guidance</p> <ul style="list-style-type: none"> Supplier CSR assessments are an effective way to obtain and validate pertinent information from suppliers on CSR issues to facilitate a better understanding of supplier performance. These are often requested by the company undergoing the EcoVadis evaluation to their own suppliers. CSR supplier assessments can be done through checklists, questionnaires or online forms and can be conducted by the client (undergoing the EcoVadis evaluation), a reliable third party or by the supplier itself. The objectives of such assessments are to identify general and sustainability-related practices as well to help identify high-risk suppliers and the need for further risk mitigation actions. 	
✓	Training of buyers on social and environmental issues within the supply chain	<p>More Information</p> <ul style="list-style-type: none"> The company provides evidence in supporting documentation regarding training on CSR issues to buyers in their organization to ensure ethical and sustainable procurement practices. <p>Guidance</p> <ul style="list-style-type: none"> The buyer-supplier relationship plays an important role in improving sustainability in the supply chain. Procurement professionals should be able to identify CSR risks in supply chain as well as develop sustainable procurement strategies to mitigate these risks. They should also be able to provide guidance on environmental, social and ethical issues to suppliers when necessary. An important component in achieving these objectives is through training of buyers on CSR issues. 	
⚠	No monitoring of % of raw materials purchased that are recycled	<p>More Information</p> <ul style="list-style-type: none"> The company declares no monitoring of its % of raw materials purchased that are recycled. <p>Guidance</p> <ul style="list-style-type: none"> Purchasing raw materials that are recycled helps to close the waste circle and to ensure that recyclable materials will continue to be recycled and not be wasted (US EPA). Examples of key performance indicators include % of raw materials purchased that are recycled. 	
✓	Conflict minerals taken into account in supplier selection process	<p>More Information</p> <ul style="list-style-type: none"> The company provides evidence in supporting documentation of additional measures present to take conflict minerals into account in the supplier selection process. <p>Guidance</p> <ul style="list-style-type: none"> Conflict minerals (CM) are gold, tin, tantalum, tungsten and their derivatives that are mined in conditions of armed conflict and human rights abuses, and which are sold or traded by armed groups. Some examples of measures might include detailed CM risk analysis, mechanisms to identify all upstream suppliers potentially exposed to using CM, measures to obtain additional information on CM from suppliers (i.e. formal procedure, escalation steps), requirement to first tier suppliers to fill an EICC reporting template, and/or investigation of smelters or refiners' conflict minerals due diligence processes. 	
✓	Some supply from companies employing mostly disabled people (e.g. sheltered workshop)	<p>More Information</p> <ul style="list-style-type: none"> The company provides evidence in the supporting documentation that they source from companies who employ disabled people (e.g. sheltered workshop). <p>Guidance</p> <ul style="list-style-type: none"> Support businesses are those that employ people with disabilities, either exclusively or primarily, and aim to support the social and professional integration or reintegration of disabled and disadvantaged persons. By sourcing from such businesses, the company is demonstrating that it integrates social considerations within its procurement operations. 	

Priority	Strength or Weakness	Additional Definition	CAP
✓	Integration of environmental, social and health & safety criteria when purchasing products	<p>More Information</p> <ul style="list-style-type: none"> • Environmental, social and health & safety criteria are formally described as an integral part of the selection process in product procurement. <p>Guidance</p> <ul style="list-style-type: none"> • CSR criteria can be integrated in calls for tenders to ensure that the environmental and social impact of the purchased product is minimized. • Some potential examples of such criteria include ecolabels, detailed product characteristics, external third party certifications (FSC, PEFC, ISO 14001), CSR performance scores. 	

SUSTAINABLE PROCUREMENT:RESULTS

Priority	Strength or Weakness	Additional Definition	CAP
✓	Standard reporting on sustainable procurement issues	<p>More Information</p> <ul style="list-style-type: none"> • There is evidence of formal reporting implemented regarding both labor and human rights issues from the company supporting documentation, including key performance indicators (KPIs), statistical figures or associated concrete actions. <p>Guidance</p> <ul style="list-style-type: none"> • Reporting items are standard in terms of quality and quantity, do cover the main issues, are meaningful enough, and are regularly updated. • KPIs may include (but are not limited to): the percentage of suppliers covered by sustainable procurement measures, and percentage of buyers trained on sustainable procurement issues. • Comprehensive reporting on sustainable procurement issues will additionally have KPIs reported in a formal public document available to stakeholders, and will be in compliance with the Global Reporting Initiative guidelines or other external CSR reporting standards. Download the How-to Guide on this topic here (in English). 	

10. The 360° WATCH: stakeholders' information

360° WATCH

✓ 10/2017 No records found for this company on Compliance Database

-

✓ 05/2017 Company must face fired worker's religion discrimination claim

A company that admitted a worker should not have been fired must defend against his claims that he was discriminated against because of his religious beliefs as a Seventh-day Adventist, a federal judge ruled Wednesday. Columbus-based NTN Driveshaft Inc. denies that a human resources manager fired Jeffrey L. Jackson for unlawful or discriminatory reasons, instead insisting that the firing was based on the manager's honest belief that Jackson had violated NTN's attendance policy.

<http://www.theindianalawyer.com/articles/43673-company-must-face-fired-workers-religion-discrimin...>

✓ 03/2017 Bearings Buyers Seek Class Certification In Auto Parts MDL

Purchasers of automotive bearings on Monday asked a Michigan federal judge to certify a class of direct buyers accusing six manufacturers, including NTN Corp, of conspiring to cook prices for the products in multidistrict litigation over a wide-ranging auto parts price-fixing conspiracy.

<http://www.law360.com/articles/904278/bearings-buyers-seek-class-certification-in-auto-parts-mdl>

✓ 12/2016 NTN Agrees To \$2M Auto Parts Price-Fixing Class Action Settlement

A \$2.1 million settlement has been proposed in a class action lawsuit alleging NTN Corp., a bearing manufacturer from Japan, engaged in an auto parts price-fixing scheme.

<http://topclassactions.com/lawsuit-settlements/lawsuit-news/350635-ntn-agrees-2m-auto-parts-price...>

✓ 11/2016 NTN Inks \$6.6M End-Payor Deal In Auto Parts Price-Fix MDL

Japanese bearing manufacturer NTN Corp. has agreed to a \$6.57 million settlement in sprawling multidistrict litigation over alleged auto parts price-fixing, according to documents filed in Michigan federal court Tuesday.

<http://www.law360.com/articles/867150/ntn-inks-6-6m-end-payor-deal-in-auto-parts-price-fix-mdl>

✓ 11/2016 NTN Corp Settles Auto Bearings Price-Fix Claims For \$10M

Japanese bearing manufacturer NTN Corp has reached a \$10 million agreement to settle allegations by indirect purchasers that the company conspired to fix the price of bearings used in automobiles.

<http://www.law360.com/articles/864495/ntn-corp-settles-auto-bearings-price-fix-claims-for-10m>

✓ 05/2016 NTN à Allonnes : un accord met fin à la grève

Après une semaine de grève qui a perturbé les lignes de production de cette société spécialisée dans les transmissions automobiles et implantée à Allonnes (800 salariés dont 650 CDI), le travail a repris chez NTN dans la nuit de lundi à mardi. Un conflit sur fond de négociation annuelle portant sur des revendications salariales était à l'origine de ce mouvement qui a donc pris fin. Un protocole d'accord a été signé par les organisations syndicales et la direction.

<http://www.ouest-france.fr/pays-de-la-loire/le-mans-72000/ntn-allonnes-un-accord-met-fin-la-greve...>

✓ 04/2016 PSA demands damages over price-fixing

Companies from French automaker PSA Group are seeking hundreds of millions of dollars in damages for overpriced parts from NTN Corp and other bid-rigging suppliers. PSA's demand is an unusually public move against suppliers engulfed in a multiyear global cartel crackdown that stretched from the U.S. and the European Union to Japan and beyond.

<http://europe.autonews.com/article/20160418/COPY/304189935/psa-demands-damages-over-price-fixing>

✓ 11/2015 NTN-SNR Roulements écope d'une amende de 87,5 millions d'euros suite à une plainte de Volvo

Un tribunal arbitral, rattaché à la chambre de commerce de Stockholm, a condamné NTN-SNR Roulements, basée à Annecy, à une amende de 87,5 millions d'euros pour des roulements considérés comme défectueux vendus au constructeur automobile suédois Volvo.

<http://france3-regions.francetvinfo.fr/alpes/haute-savoie/annecy/ntn-snr-roulements-ecope-d-une-a...>

✓ 08/2015 2015 IPE Regulatory Record for Beijing NTN-Seohan Driveshaft Co., Ltd. [CN]

In 2015, the subsidiary Beijing NTN-Seohan Driveshaft Co., Ltd. violated air pollution control management system and received administrative penalty notice by the Beijing Tongzhou District Environmental Protection Bureau.

<http://www.ipe.org.cn/IndustryRecord/regulatory-record.aspx?companyId=237060&dataType=0&isyh=0>

✓ 07/2015 Cade signs agreements with companies investigated in the cartel bearing [PT]

The Administrative Council for Economic Defense (Cade) has signed two agreements with NTN-SNR Roulements SA and other companies investigated for the cartel in the bearing industry. The companies will have to pay \$ 3 million and an additional R \$ 60 million as part of the settlement.

<http://177.126.187.196:8080/preview/www/2.182/2.258/1.354021>

✓ 07/2015 2015 IPE Regulatory records for Shanghai Laien Precision Machine Tool Accessories Co., Lt...

IN 2015, the subsidiary Shanghai Laien Precision Machine Tool Accessories Co., Ltd. violated regulations on Environmental Protection for Construction Projects and was ordered to rectify and fined by the Shanghai Pudong New Area Environmental Protection Bureau.

<http://www.ipe.org.cn/IndustryRecord/regulatory-record.aspx?companyId=233884&dataType=0&isyh=0>

✓ 07/2015 Lawsuit: Employees claim NTN didn't pay for extra work

A Columbus, Ind., worker on Monday became the 30th person to join in a federal lawsuit filed against NTN Driveshaft Inc. by employees claiming the firm violated the Fair Labor Standards Act. The lawsuit was initiated in January 2014 when Stefan Hartford, an assembly line worker, filed a complaint against the Columbus manufacturer saying NTN had not paid some hourly employees for time that was worked "off the clock" or for overtime.

http://www.heraldbulletin.com/news/local_news/lawsuit-employees-claim-ntn-didn-t-pay-for-extra-wo...

✓ 05/2015 En Haute-Savoie, le procureur fait feu sur l'inspection du travail (Mediapart)

Avec plus de 2 400 salariés répartis sur cinq usines, NTN-SNR-Roulements, filiale du groupe japonais NTN, est ce qu'on appelle un gros pourvoyeur d'emplois à Annecy en Haute-Savoie. Au vu de son insolente santé économique en plein marasme, NTN-SNR devrait créer des emplois et augmenter les salaires. Eh bien non, il use et abuse de travailleurs intérimaires en lieu et place de salariés en contrat à durée indéterminée sur des postes permanents de production, généralement les moins qualifiés et les plus difficiles.

<http://www.cnt-tas.org/2015/05/26/mediapart-haute-savoie-procureur-fait-feu-sur-inspection-du-tra...>

✓ 03/2015 Japanese Court Convicts Bearing Manufacturer and Former Executives

Though it is rare to see a criminal price-fixing case to go to trial in Japan, on February 4, 2015, the Tokyo District Court convicted NTN Corporation, a Japanese bearing manufacturer, and two of its former executives for violations of the Anti-Monopoly Act of Japan in connection with alleged participation in a cartel to fix prices for the domestic sales of bearings. The court imposed a 400 million yen (approximately \$3.4 million) criminal fine on NTN, and the company's former executives were sentenced to 18 months and 12 months in prison, respectively.

<http://www.lexology.com/library/detail.aspx?q=b3e9082b-cd3d-41b1-b090-d8a2924e4ea3>

✓ 02/2015 OSHA Penalty for Serious H&S Standard Violations

In February 2015, Ntn-Bower Corp in Macomb, IL, was fined USD 8,000 for two serious violations of U.S. OSHA health and safety standards.

https://www.osha.gov/pls/imis/establishment_inspection_detail?id=1042084.015

✓ **02/2015 OSHA Penalty for Serious H&S Standard Violation**

In February 2015, American Ntn Bearing Mfg Corp in Elgin, IL, was fined USD 2,975 for one serious violation of U.S. OSHA health and safety standards.

https://www.osha.gov/pls/imis/establishment_inspection_detail?id=1029848.015

✓ **12/2014 OSHA Penalty for Serious H&S Standard Violations**

In December 2014, Ntn-Bower Corporation in Macomb, IL, was fined USD 15,000 for seven serious violations of U.S. OSHA health and safety standards.

https://www.osha.gov/pls/imis/establishment_inspection_detail?id=1012810.015

✓ **08/2014 China Fines Japan Bearing Makers for Antitrust Violations**

China's antitrust regulator fined Japanese bearing makers NSK Ltd. and NTN Corp. a combined 4.8 billion yen (\$47 million) for violating rules amid a probe into industry pricing practices. NSK and NTN were fined 2.9 billion yen and 1.9 billion yen, respectively, by China's National Development and Reform Commission, according to the companies' statements to the Tokyo Stock Exchange.

<http://www.bloomberg.com/news/articles/2014-08-19/china-imposes-28-million-antitrust-fine-on-japa...>

✓ **05/2014 Singapore fines Japanese ball bearing firms S\$9.3 mln for price-fixing**

Singapore's anti-trust regulator fined three Japanese manufacturers S\$9.3 million (\$7.42 million) on Tuesday for taking part in a ball bearing pricing cartel, the latest move in a global investigation of price-fixing by car parts makers. NTN Corp was fined S\$455,652.

<http://www.reuters.com/article/singapore-antitrust-japan-idUSL3N0OC00Y20140528>

✓ **03/2014 200 millions d'euros d'amende, mais pas d'impact sur les résultats pour NTN**

Suite à l'annonce de l'amende record, infligée par la commission européenne aux fabricants de roulements automobiles, pour une entente illicite sur les prix de vente, la société Japonaise NTN, qui contrôle la filiale française NTN-SNR, installée à Annecy, a publié un communiqué indiquant qu'il n'y avait "pas de révision des prévisions de bénéfices".

<http://www.ledauphine.com/haute-savoie/2014/03/20/200-millions-d-euros-d-amende-mais-pas-d-impact...>

✓ **07/2013 NTN-SNR invests R \$ 100 million in productivity [PT]**

NTN-SNR is in a new phase of operation in Brazil: the company invests R \$ 100 million in the period 2011-2014 for the expansion and increase of the productive capacity of its two factories in the country.

<http://www.automotivebusiness.com.br/noticia/17411/ntn-snr-investe-r-100-milhoes-em-productividade>

✓ **03/2013 Japan Fines Bearing Cos. \$142M For Price-Fixing**

Japan's antitrust regulator on Friday fined NTN Corp. and other bearing manufacturers 13.4 billion yen (\$142 million) for violating the Antimonopoly Act, saying the companies conspired to fix prices for both automotive and industrial machinery bearings.

<http://www.law360.com/articles/428573/japan-fines-bearing-cos-142m-for-price-fixing>

✓ **02/2013 Allonnes. La direction de l'usine NTN assigne 18 grévistes en justice**

Le mouvement de grève lancé mardi midi chez NTN, à Allonnes, s'est achevé ce mercredi matin. Les salariés grévistes de l'usine, qui fabrique des joints de transmission pour l'automobile, réclamaient une hausse de salaire, une revalorisation de la prime de transport et une indemnité pour le quart d'heure consacré à la douche.

http://www.lemans.maville.com/actu/actudet_-allonnes.-la-direction-de-l-usine-ntn-assigne-18-grev...

✓ **01/2013 OSHA Penalty for Serious H&S Standard Violations**

In January 2013, Ntn Drive Shaft Inc in Columbus, IN, was fined USD 2,062 for 2 serious violations of U.S. OSHA health and safety standards.

http://www.osha.gov/pls/imis/establishment_inspection_detail?id=316544782

✓ **11/2012 NTN-SNR Roulements ferme ses sites de production annéciens à la fin de l'année**

Le fabricant de roulements s'organise en interne pour faire face à la conjoncture et au ralentissement de son activité liée au marché automobile. Il opère dans le même temps une réorganisation stratégique de sa logistique et investit 9,8 millions d'euros pour une nouvelle plateforme de distribution.

<http://www.usinenouvelle.com/article/ntn-snr-roulements-ferme-ses-sites-de-production-anneciens-a...>

The 360° is a web based tool to collect stakeholders insight on a company's CSR approach and impacts. A corporate stakeholder is a party that can affect or be affected by the actions of the company and the achievement of its objectives (i.e. employees, clients, suppliers).

Note: If a strength or weakness is activated on the 360°, this is an indicator that the 360° has had an impact on the score.

Only legitimate stakeholder sources are selected:

- + Governmental organizations (i.e. government environmental protection administrations, anti-trust agencies, customers protection agencies)
- + CSR networks and initiatives
- + Trade unions and employers' organizations
- + International organizations (i.e. UN, ILO, UNEP, ...)
- + NGO's (i.e. Greenpeace, Clean Clothes Campaign, Transparency international, UFC, ...)
- + Research institutes and reputable press (CSR Asia, Blacksmith Institute, ...)

11. SPECIFIC COMMENTS

Specific comments are key points which indicate some specific characteristics of the company CSR evaluation and will help to better understand the company's performance.

- L'entreprise n'est pas incluse dans une des principales listes de sanctions/surveillance relatives à la conformité.
- L'entreprise a été impliquée dans une controverse majeure (voir 360°), ce qui fait douter du fait qu'elle puisse maintenir des standards internationaux/nationaux.
- Certains documents justificatifs ont été jugés trop anciens pour être inclus dans cette évaluation
- L'entreprise démontre la mise en place d'un système de management RSE complet sur les quatre thèmes évalués.

MORE INFORMATION

For more information, please refer to our website (<http://www.ecovadis.com>) where you can also connect to the EcoVadis platform.

If you have any questions or problems, do not hesitate to contact us:

- ✦ By email at: support@ecovadis.com
- ✦ By phone : +33 (0) 1 82 28 88 88

Provided under contract for exclusive use of subscriber: **Steve Richez - 23/04/2018**

This assessment is valid for 12 months only.

APPENDIX : CATEGORY PROFILE

A Category Profile offers practical insights into the key sustainability issues which are applicable to the company industry of operation. It provides a link to major regulations, sector initiatives, and eco-labels.

The company industry of operation has been determined based on International *Standard Industrial Classification of All Economic Activities (ISIC)*, which is a compilation of all global economic activities published by the United Nations Statistical Commission.

The International Standard Industrial Classification of All Economic Activities (ISIC) main purpose is to provide a set of activity categories that can be utilized for the collection and reporting of statistics according to such activities.

International Standard Industrial Classification of All Economic Activities, Rev.4, United Nations, New York, 2008

It is possible that a company has operations in more than one category, but EcoVadis classifies companies based on their main area of operation.

CRITERIA ACTIVATION BY THEME:

Each category faces specific CSR issues and risks based on their industry of operation. The below chart shows the criteria activated for the company category name : **Manufacture of general-purpose machinery**.

 Environment	 Labor Practices	 Fair Business Practices
<input checked="" type="checkbox"/> Energy Consumption & GHG <input checked="" type="checkbox"/> Water <input type="checkbox"/> Biodiversity <input checked="" type="checkbox"/> Local Pollutions <input checked="" type="checkbox"/> Materials, Chemicals & Waste <input type="checkbox"/> Product Use <input checked="" type="checkbox"/> Product End of Life <input type="checkbox"/> Protection of customer/consumer health & safety <input type="checkbox"/> Promotion of sustainable consumption	<input checked="" type="checkbox"/> Employees Health & Safety <input checked="" type="checkbox"/> Working Conditions <input checked="" type="checkbox"/> Labor Relations <input checked="" type="checkbox"/> Career Management <input type="checkbox"/> Child & Forced Labor <input checked="" type="checkbox"/> Discrimination et harcèlement <input checked="" type="checkbox"/> External Human Rights Issues	<input type="checkbox"/> Corruption & Bribery <input checked="" type="checkbox"/> Anti-competitive practices <input type="checkbox"/> Gestion de l'informaion responsable <div style="background-color: #e6f2e6; padding: 2px;"> Sustainable Procurement</div> <input checked="" type="checkbox"/> Suppliers & Environment <input checked="" type="checkbox"/> Suppliers & Social
<input type="checkbox"/> Non activé <input checked="" type="checkbox"/> Importance moyenne <input checked="" type="checkbox"/> Importance haute <input checked="" type="checkbox"/> Seulement dans les pays à risques <input checked="" type="checkbox"/> Noteworthy Practices		

KEY CSR ISSUES

This section shows a qualitative explanation of the key CSR issues and risk pertaining to **Manufacture of general-purpose machinery**.

Key CSR Issues**ENVIRONMENT****Energy Consumption & GHG**

Definition: Energy consumption (e.g. electricity, fuel,...) during operations and transport. Greenhouse gazes emissions including CO₂, CH₄, N₂O, HFC, PFC and SF₆.

Sectorial issues: Manufacturing of general purpose machinery such as power-driven hand tools, office machinery, air conditioners and lifting and handling equipment is energy intensive. Energy conservation during production is crucial to minimize environmental impacts, such as greenhouse gas emissions. Increases in the cost of energy have stimulated development of both energy- and material- saving technologies. Many manufacturing companies have developed energy management systems or carbon management programs. Initiatives to mitigate risks in the sector include the use of alternative modes of transportation, inspecting for refrigerant leaks in the air conditioner manufacturing process, and replacing gasoline-powered forklifts for logistics with electric models. Sector leaders such as Daikin use alternative sources of energy such as hydropower which utilizes the in-house cooling water, and wind and solar power to provide electricity for equipment such as outdoor lighting.

Water

Definition: Water consumption during operations. Management of pollutants rejected into water.

Sectorial issues: The manufacture of general purpose machinery does not require as much water as other manufacturing industries such as iron and steel. Nevertheless, significant risks of water pollution during the manufacturing process exist. Companies must properly control and treat waste water, chase any leakage and ensure safe handling of chemicals. Waste water retained in unsealed or leaking holding ponds can seep into the groundwater and may contaminate the local water table and aquifers. To reduce water consumption, companies in the sector conduct risk assessments, build in-house water recycling systems, and utilize innovative water purification technologies to ensure cleanliness of wastewater discharge. Specific technologies include ion exchange technologies, reverse osmosis and nanofiltration technologies.

Local Pollutions

Definition: Local emissions of dust, and noise levels from operations. Also includes road congestion.

Sectorial issues: Diverse local pollutions may result from manufacturing general purpose machinery such as engines, turbines, pumps and power-driven hand tools. Noise pollution is caused by equipments and machinery. Dust and fumes are generated at many stages during the manufacturing process. (1) Companies have to install and maintain adequate filters properly. In addition, there are significant risks of spillage or pollution linked to the handling and storing of chemicals that may contaminate air, soil and water. National legal frameworks impose procedures to mitigate the risk of accidents (e.g. the IPPC directive in the European Union (2)).

Materials, Chemicals & Waste

Definition: Management and reduction of non-hazardous and hazardous materials, chemicals and waste (e.g REACH).

Sectorial issues: In line with other manufacturers, companies within the general purpose machinery sector generate significant levels of waste such as sludge, metals, toxic. Producing machinery results in the generation of hazardous chemicals. Reducing the generation of these wastes at the source, or recycling these wastes, will benefit general purpose machinery manufacturers by increasing product yields, reducing raw material needs, reducing disposal costs and reducing the liabilities associated with hazardous waste management. Proactive companies in the sector such as Daikin and Groupe Ciat have implemented initiatives such as recycling programs for paper and batteries and training programs on chemical and hazardous materials.

Product End of Life

Definition: Mitigation of environmental impacts from product end-of-life (e.g. recycling, WEEE, RoHS)

Sectorial issues: A product is considered at its end-of-life when it completes its service life time. General purpose machinery such as power-driven hand tools, office machinery, air conditioners, lifting and handling equipment usually become obsolete or come to the end of their useful life after a few years of service. The end of life aspect of the product is important since those materials contain metal pieces that could be melted and also usually contain some chemical elements. The economically, social and environmentally sustainable option is to take back, reuse, recycle and/or properly dispose of these products at their end-of-life. Strategies adopted by companies include recycling schemes for air condition units, recovering refrigerants from products, take back programs, and life cycle assessment on products during the R&D phase.

LABOR PRACTICES

Employees Health & Safety

Definition: Management of employees health and safety issues.

Sectorial issues: Employees are exposed to many risks including noise, dust, harmful chemicals and excess vibration. Companies are mitigating risks by investing more in employee training and ensuring equipment is adequately maintained. Other measures include providing employees with adequate protective equipments and ensuring good maintenance of machinery. This is particularly important during the manufacturing of general purpose machinery where foreign-body eye hazards are prevalent in most areas, especially in the handling of raw materials such as metals during the production of engines, lifting and handling equipment. Finally, as is the case in many industries, there are risks of strain injuries due to repetitive movements. Exposures to noise and potential accidents linked to the use of machinery have to be managed as well.

Working Conditions

Definition: Communication and exchanges between management and employees on working conditions, participation from employees, wages and benefits.

Sectorial issues: The Fifth European Working Conditions survey performed in 2010 shows that overall, 18% of workers in the EU27 are not satisfied with their work-life balance. (3) The manufacturing of general purpose machinery industry sector does not face specific severe risks other than the standard working conditions apply to any industry (e.g. working hours, holidays, wages and benefits). Nevertheless, as in all manufacturing sectors, employees' time schedules need to include a minimum amount of flexibility and non-typical working hours have to be compensated.

Labor Relations

Definition: Structured social dialogue and employee representatives.

Sectorial issues: The Global poll 2012 led by the International Trade Union Confederation (ITUC)(4) shows that 70% of workers from 13 countries worldwide think current labor laws provide inadequate legal protection on wages, and 44% think the legal framework does not ensure reasonable working hours. Therefore, a sound and structured social dialog is important, especially in the context of a medium skilled workforce, such as manufacturers of general purpose machinery.

Career Management

Definition: Recruitment, evaluation, training and management of layoffs.

Sectorial issues: A strong workforce provides the basis for a successful company. In order to foster their commitment, companies that manufacture general purpose machinery must continually offer trainings to enable employees to develop skills, enhance their productivity, increase their quality of work and boost employee satisfaction with their jobs and working conditions. An effective employee training program limits job turnover and can increase innovation of strategies and products, which results in improved operations. The number of training hours provided by companies in this sector varies significantly depending on the size and geographical location.

Discrimination et harcèlement

Definition: Measures taken to avoid or eliminate discrimination. Discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, termination; based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age.

Sectorial issues: Diversity at work is a key issue to any company. It is addressed by specific regulations in most countries as well as sectorial and national initiatives. Managers in the manufacturing of general purpose industry as well as in any other industry have to effectively mitigate potential risks, for example regarding cases of gender discrimination or discrimination against handicapped workers.

External Human Rights Issues

Definition: Measures taken to respect external human rights issues. This includes the respect of security, property rights, privacy rights, civil & political rights, rights to freedom of association and collective bargaining, social & cultural rights (including indigeneous people and other minorities i.e. vulnerable groups) as well as the prevention of inhumane or degrading treatment.

Sectorial issues: Respect for human rights at work is a basic principle mentioned by several initiatives such as the Universal Declaration of Human Rights, the ILO principles or the Global Compact principles. It is an issue that applies to the manufacturing of general purpose machinery industry with operations in risk countries.

FAIR BUSINESS PRACTICES

Corruption & Bribery

Definition: Measures taken to ensure the promotion and adoption of initiatives to counter all forms of corruption, including extortion and bribery.

Sectorial issues: Corruption and bribery issues are major issues for any company, particularly when operating in high-risk countries. Regulations such as the FCPA (Foreign Corrupt Practice Act) in the US address these issues and for example make payments to foreign government officials to obtain or retain business unlawful.

Anti-competitive practices

Definition: Measures taken to avoid and eliminate anti-competitive practices. Anti-competitive behavior includes among others: bid-rigging, price fixing, dumping, predatory, pricing, coercive monopoly, dividing territories, product tying and limit pricing.

Sectorial issues: Anti-competitive practices such as collusions, price dumping, coercive monopolies represent a significant risk for companies in the manufacture of general purpose machinery. Major condemnations have been made by the European Union (EU) or the United States of America (USA) regarding cartels and price fixing in various large companies within the industry.

SUSTAINABLE PROCUREMENT

Suppliers & Environment

Definition: Measures taken by companies to integrate environmental criteria in the selection and management of suppliers.

Sectorial issues: The supply of raw materials is a key issue for the sector. To mitigate environmental impacts in their supply chain, companies have to invest resources to ensure that suppliers have robust systems in place to manage the transportation and handling systems of raw materials to manufacturing facilities. They also have to ensure that suppliers comply at least with international standards regarding manufacture of chemicals (e.g. REACH in EU.)

Suppliers & Social

Definition: Measures taken by companies to integrate labor practices and human rights criteria in the selection and management of suppliers.

Sectorial issues: Social issues in the supply chain can have a major impact on the company image as several examples illustrated in the past few years (e.g. Nike, Apple). In the manufacture of general purpose machinery industry, risks can occur when a company subcontracts a part of its workforce. Companies must ensure that subcontractors working in their facilities are at least covered by standard social measures, especially regarding health and safety conditions. Making sure subcontractors comply with basic labor requirements, through CSR assessments or audits are a measure to lower these risks. Making sure subcontractors comply with basic labor requirements through a CSR assessments or an audit are measures that can limit these risks.

SOURCES

Sources

- 1- Travis Haynam, Sustainable Manufacturer Network, 2011, Energy-efficient and EPA-compliant air pollution control
<http://sustainablemfr.com/air-emissions/energy-efficient-epa-...>
- 2- Wikipedia, 2014, Integrated Pollution Prevention and Control
http://en.wikipedia.org/wiki/Integrated_Pollution_Prevention_...
- 3- Dr Jane Pillinger, European Trade Union Confederation, 2010, Working for Better Times
<http://www.eurofound.europa.eu/>
- 4- International Trade Union Confederation, 2014, Building Workers' Power Congress Record
www.ituc-csi.org/IMG/pdf/congress_record_final.pdf
- 5- ILO
<http://www.ilo.org/global/lang--en/index.htm>

MAIN REGULATIONS AND SECTORS INITIATIVES

This section provides a list of text references related to major CSR standards, regulations, labels or sector initiatives pertaining to **Manufacture of general-purpose machinery**.

Main Regulations and Sectors Initiatives (🏛️ = Regulatory)



ENV : EU Directive 2006/42/CE on machinery 🏛️

Revised Machinery Directive 2006/42/EC (includes improvements on safety of the current Machinery Directive 98/37/EC).
Deadline for national law transposition: 29th June 2008.
<http://ec.europa.eu/enterprise/sectors/mechanical/documents/l...>



ENV : EU directive WEEE (waste electrical and electronic equipment) 🏛️

The WEEE directive sets collection, recycling and recovery targets for all types of electrical goods. It imposes the responsibility for the disposal of waste electrical and electronic equipment on the manufacturers of such equipment.
http://ec.europa.eu/environment/waste/weee/legis_en.htm



LAB : ILO convention 174 and recommendation 181" Prevention of Major Industrial Accidents" 🏛️

International instruments on the prevention of industrial accidents
<http://www.ilo.org/ilolex/cgi-lex/convde.pl?C174>



LAB : Standard SA8000 (Social Accountability)

The SA8000 standard is a global social accountability standard for decent working conditions, developed and overseen by Social Accountability International (SAI). It is an auditable certification standard based on international workplace norms of International Labour Organisation (ILO) conventions, the Universal Declaration of Human Rights and the UN Convention on the Rights of the Child.
<http://www.sa-intl.org/index.cfm?fuseaction=Page.viewPage&pag...>



ENV : US National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries 🏛️

In 2004, the EPA issued national emission standards to control hazardous air pollutants emitted from iron and steel foundries. This action amends the work practice requirements for materials certification and scrap selection/inspection programs.
<http://www.epa.gov/ttn/atw/ifoundry/ifoundrypg.html>



ENV : Standard ISO 14000 (International Standard Organisation)

The ISO 14000 family addresses various aspects of environmental management
http://www.iso.org/iso/iso_14000_essentials

LAB : Universal Declaration of Human Rights 🏛️

The Universal Declaration of Human Rights (UDHR) is an advisory declaration adopted by the United Nations General Assembly (10 December 1948)
<http://www.un.org/Overview/rights.html>

LAB : International Labor Organization's Fundamental Conventions 🏛️

The Governing Body of the International Labour Office has identified eight Conventions as fundamental to the rights of human beings at work. These rights are a precondition for 12 the others in that they provide a necessary framework from which to strive freely for the improvement of individual and collective conditions of work.
http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declara...

LAB : Standard OHSAS 18001 (Occupational Health and Safety Assessment Series)

OHSAS 18000 is an international occupational health and safety management system specification.
<http://www.ohsas-18001-occupational-health-and-safety.com/ind...>

FBP : Foreign Corrupt Practices Act of 1977 🌐

The Foreign Corrupt Practices Act of 1977 (FCPA) prohibits payments, gifts, or Practices Act contributions to officials or employees of any foreign government or government-owned business for the purpose of getting or retaining business.
<http://www.usdoj.gov/criminal/fraud/fcpa/>

**FBP : United Nations Convention against Corruption (UNCAC)** 🌐

The UNCAC is the first legally binding international anti-corruption instrument. In its 8 Chapters and 71 Articles, the UNCAC obliges its States Parties to implement a wide and detailed range of anti-corruption measures affecting their laws, institutions and practices.
<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

**ALL : United Nations Global Compact (10 principles)**

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of ten principles in the areas of human rights, labour standards, the environment, and anti-corruption:
<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/in...>

**ALL : OECD guidelines for multinational enterprises**

The Guidelines are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide voluntary principles and standards for responsible business conduct in a variety of areas including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition, and taxation.
<http://www.oecd.org/corporate/mne/>

**ALL : Standard Global Reporting Initiative's (GRI)**

The GRI is a network-based organization, that has set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance.
<https://www.globalreporting.org>

**ALL : Standard ISO 26000 (International Standard Organisation)**

The future International Standard ISO 26000, Guidance on social responsibility, will provide harmonized, globally relevant guidance based on international consensus among expert representatives of the main stakeholder groups and so encourage the implementation of best practice in social responsibility worldwide.
<http://www.iso.org/iso/pressrelease.htm?refid=Ref972>

**ENV : Carbon disclosure project**

CDP is an international, not-for-profit organization providing the only global system for companies and cities to measure, disclose, manage and share vital environmental information.
<https://www.cdp.net>

ADDITIONAL CATEGORY STATISTICS**Critical Category Strength and Improvement areas (% Suppliers)**

