



ecovadis

EcoVadis Corporate Social
Responsibility (CSR)
Assessment Report

Company assessed:
CRAYON GROUP AS (GROUP)

Overall score: 54 /100
April 2020

CSR performance: Moderate

Size: L
Headquarters country: Norway
Risk country operations: Yes
Industry: Computer programming, consultancy and
related activities

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ABOUT CORPORATE SOCIAL RESPONSIBILITY (CSR)

Corporate Social Responsibility (CSR) is the continuing commitment to act 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, trading partners, government).

ABOUT THE ASSESSMENT

The EcoVadis methodology framework assesses companies' policies and actions as well as their published reporting related to the environment, labor and human rights, ethics and sustainable procurement. Our team of international sustainability experts analyze and crosscheck companies' data (supporting documents, 360° Watch Findings, etc.) in order to create reliable ratings, taking into account each company's industry, size and geographic location.

ABOUT ECOVADIS

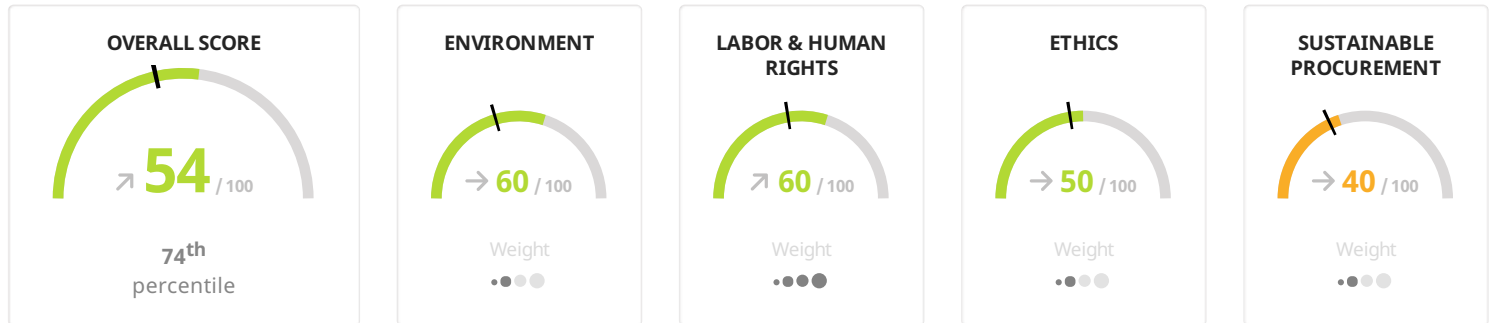
EcoVadis provides the leading solution for monitoring sustainability in global supply chains. Using innovative technology and CSR expertise, we strive to engage companies and help them adopt sustainable practices.

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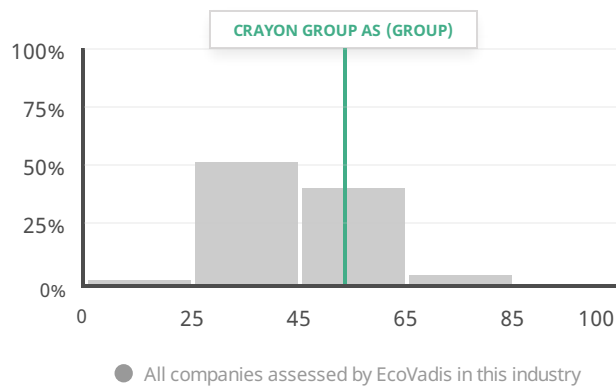
1. CSR PERFORMANCE OVERVIEW

Score breakdown

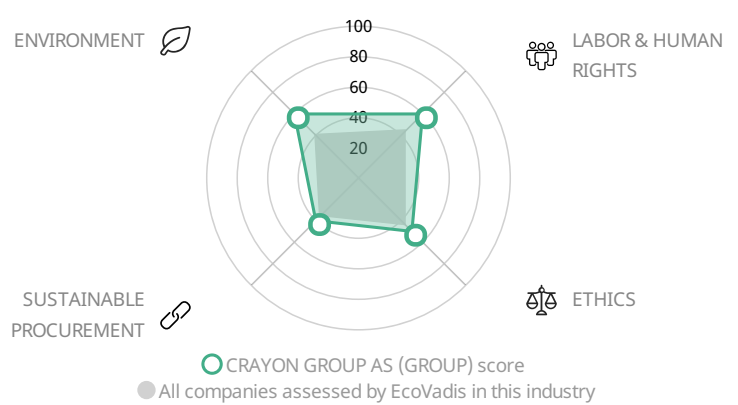
CSR Performance ● Insufficient ● Partial ● Moderate ● Advanced ● Outstanding — Average score



Overall score distribution



Theme score comparison



CRAYON GROUP AS (GROUP) has been awarded a silver medal in recognition of CSR achievement! To receive this medal, companies must have an overall score of 54-66.

Corrective Action Plan in progress

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. CRAYON GROUP AS (GROUP) has a corrective action plan in place and is working on improving their CSR management system.

* You are receiving this score/medal based on the disclosed information and news resources available to EcoVadis at the time of assessment. Should any information or circumstances change materially during the period of the scorecard/medal validity, EcoVadis reserves the right to place the business' scorecard/medal on hold and, if considered appropriate, to re-assess and possibly issue a revised scorecard/medal.

2. ASSESSMENT BENEFITS

Understand :

Get a clear picture of a company's CSR performance. The scorecard is the final output of the EcoVadis assessment. It rates and benchmarks a company's CSR performance in four themes on a scale of 0-100 and highlights strengths and improvement areas.

Know where a company stands compared to their industry. Benchmark the company's CSR performance against the industry with a score distribution graph and theme score comparisons.

Identify industry trends. Discover the primary CSR risks, regulations, hot topics and best practices related to specific industries.

Communicate :

Meet customer needs. More and more companies raise questions about their trading partners' environmental and social performance. The EcoVadis assessment allows companies to demonstrate their commitment.

Leverage a unique communication tool. Companies with an EcoVadis Scorecard avoid audit fatigue by sharing one assessment with all requesting customers.

3. ASSESSMENT PROCESS

1

Customer Request

Procurement, CSR, EHS, and Sustainability leaders in enterprises looking to monitor CSR risk in the supply chain request an EcoVadis assessment for their trading partners.

2

Questionnaire

Based on a company's specific Corporate Social Responsibility (CSR) risk factors, a customized questionnaire is created. It contains 20 to 50 questions tailored to the industry, size and location.

3

Document Analysis

Companies are required to provide supporting documentation for their answers to the questionnaire. These documents are reviewed by our CSR analysts.

4

Public Information

Company information that is publically available, most often found on the company website, is also collected as evidence of their CSR performance.

5

360° Watch Findings

360° Watch Findings comprise relevant public information about companies' CSR practices, identified via more than 2,500 data sources. They can have positive, negative or no score impact.

6

Expert Analysis

Our CSR analysts combine all these elements to produce one unified scorecard per company.

SCORECARD



4. ECOVADIS METHODOLOGY

A. Four Themes and 21 Criteria

EcoVadis assessments focus on 21 issues which are grouped into 4 themes (Environment, Labor & Human Rights, Ethics, Sustainable Procurement). The 21 issues or criteria are based upon international CSR standards such as the Global Compact Principles, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standard, the ISO 26000 standard, and the CERES principles.

21 CSR criteria

1. ENVIRONMENT

OPERATIONS

Energy consumption & GHGs
Water
Biodiversity
Local & Accidental Pollution
Materials, Chemicals & Waste

PRODUCTS

Product Use
Product End-of-Life
Customer Health & Safety
Environmental Services & Advocacy

3. ETHICS

Corruption
Anticompetitive Practices
Responsible Information Management

2. LABOR & HUMAN RIGHTS

HUMAN RESOURCES

Employee Health & Safety
Working Conditions
Social Dialogue
Career Management & Training

HUMAN RIGHTS

Child Labor, Forced Labor & Human Trafficking
Diversity, Discrimination & Harassment
External Stakeholders Human Rights

4. SUSTAINABLE PROCUREMENT

Supplier Environmental Practices
Supplier Social Practices



B. Seven Management Indicators

EcoVadis assessments evaluate a company's CSR management system by looking at seven management indicators. These are used to further customize the assessment by weighting the four themes and their subsequent 21 CSR criteria.



Policies (weight: 25%)

1. Policies: Mission statements, policies, objectives, targets, governance
2. Endorsement: Endorsement of external CSR initiatives

Actions (weight: 40%)

3. Measures: Measures and actions implemented (e.g. procedures, training, equipment)
4. Certifications: Certifications and labels (e.g. ISO 14001)
5. Coverage: Coverage of measures and actions

Results (weight: 35%)

6. Reporting: Reporting on Key Performance Indicators (KPIs)
7. 360: Condemnations, Controversies, Awards

5. UNDERSTANDING A SCORECARD

The overall score can be better understood by looking at quantitative information (theme scores and activated criteria) and qualitative information (strengths and improvement areas).

A. Quantitative 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 & Human Rights, Ethics, Sustainable Procurement) have specific criteria associated with them. Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Non-activated

If certain criteria are not activated, then the specific associated issue is not relevant or has very low CSR risk for that company.

Medium

Medium importance criteria are the issues some CSR risk is present but not the most pressing.

High

High importance criteria are the issues where the company faces the greatest CSR risk.

! Risk countries only

Criteria classified as Only in Risk Countries are activated only if the company has significant operations in one or more countries identified as risky.

B. Qualitative Information: Strengths & Improvement Areas

Qualitative information provides more details and insights into a company's score. For each theme, the company is assigned strengths (elements of their CSR management system that are positive) and improvement areas (elements of their CSR management system that need to be improved). The strengths and improvement areas are divided according to the three management layers (Policies, Actions, Results) and are also classified by priority.

All improvement areas are automatically added to the company's Corrective Action Plan. They are pre-organized by priority. The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback.

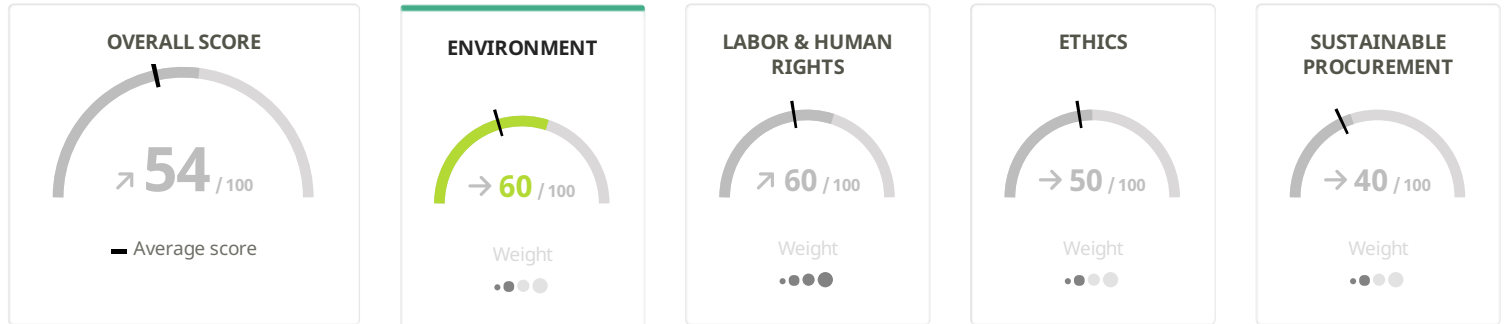
C. The Scoring Scale

0 - 24	Insufficient	No engagements or tangible actions regarding CSR. Evidence in certain cases of misconduct (e.g. pollution, corruption).
25 - 44	Partial	No structured CSR approach. Few engagements or tangible actions on selected issues. Partial reporting on Key Performance Indicators. Partial certification or occasional labeled product.
45 - 64	Moderate	Structured and proactive CSR approach. Engagements/policies and tangible actions on major issues. Basic reporting on actions or Key Performance Indicators.
65 - 84	Advanced	Structured and proactive CSR approach. Engagements/policies and tangible actions on major issues with detailed implementation information. Significant CSR reporting on actions and Key Performance Indicators.
85 - 100	Outstanding	Structured and proactive CSR approach. Engagements/policies and tangible actions on all issues with detailed implementation information. Comprehensive CSR reporting on actions and Key Performance Indicators. Innovative practices and external recognition.

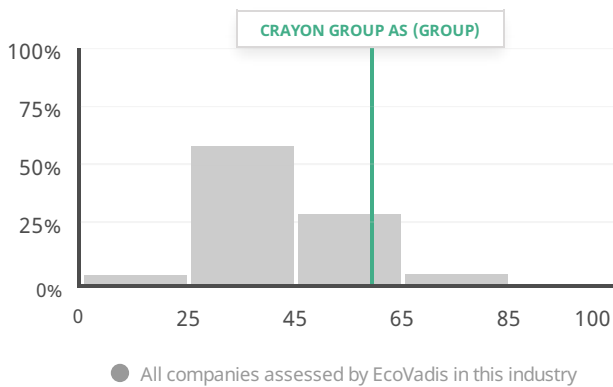
6. ENVIRONMENT

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

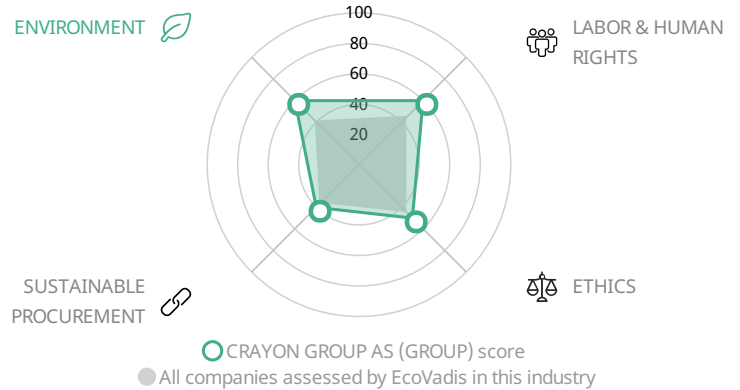
Environment Score Breakdown



Theme score distribution



Theme score comparison



Environment: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Environment: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

Strengths (14)

Policies

Standard policy on a majority of environmental issues

Information

A standard environmental policy includes commitments and/or operational objectives on the main environmental risks the company faces.

Guidance

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. It is also mandatory for the policy to incorporate some of the following organizational elements: scope of application, allocation of responsibilities, and/or a formal review process. Policies are deemed exceptional when all environmental 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).

Endorsement of the United Nations Global Compact (UNGC)

Information

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The company is a formal signatory of this initiative.

Guidance

The United Nations Global Compact is a United Nations strategic policy initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. Companies sign the initiative and then are required to provide overviews of their management system through a mandatory disclosure framework (annual publication of a Communication on Progress [COP]).

Actions

Energy audit or carbon assessment performed

Information

The company has provided supporting documentation demonstrating that it has performed an energy audit or carbon assessment.

Guidance

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.

Measures to reduce CO2 emissions from business travel

Information

The company has implemented specific measures to reduce the amount of CO2 emissions related to business travel.

Guidance

Examples might include avoiding business travel thanks to video conferencing, selecting transportation based on environmental impacts (train vs plane or relying on public transport vs cars), car sharing, and using company vehicles fueled by alternative energy, etc.

Measures to reduce energy consumption

Information

The company has implemented specific measures to reduce the consumption of energy related to its activities.

Guidance

Examples might include selection of energy efficient equipment e.g. energy star office equipment, switching to LED lamps, improvement of building isolation.

Measures to reduce paper consumption

Information

The company has implemented specific measures to reduce the consumption of paper related to its activities.

Guidance

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).

Specific measures to manage battery waste

Information

There are supporting documents demonstrating that the company has specific measures in place to manage battery waste.

Guidance

Since batteries contain several heavy metals and toxic chemicals and disposing them by the same process as regular trash has raised concerns over soil contamination and water pollution. Specific measure to treat battery waste can be recycling of batteries. The EU implemented the Battery Directive legislation to address this issue. In the U.S and Canada, they have implemented the Call2Recycle program initiated by the Rechargeable Battery Recycling Corporation (RBRC). Best practices among companies is to collect all used batteries and send for recycling by a third party - this can be managed the same way as E-waste, e.g. outdated computers, printers, phones, and other electronics.

Specific environmental certification [Environmental Lighthouse]

Information

The company declares that it has obtained certain certification on environmental issues.

Guidance

Certifications according to an international norm and verified by a credible 3rd party enhance the actions and measures put in place by a company, and confirm a structured management system. Some examples of such certifications might include: EMAS, British Retail Consortium (BRC), Recycling Industry Operation Standard (RIOS) or LEED (US Green Building Council Certificate) certificates.

Measures implemented to recycle toners & ink cartridges

Information

The company has implemented specific measures to collect and recycle toners and ink cartridges.

Guidance

The ink and toner used in cartridges are hazardous materials which need to be disposed of correctly to avoid environmental and health impacts. Toners and ink cartridges can also be collected to be refilled.

Waste management measures in place

Information

The company has implemented specific actions regarding management of waste.

Guidance

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.

Measures to recycle IT equipment

Information

The company has implemented specific measures to recycle IT equipment (e.g. computer, server, printer, telephone)

Guidance

Examples of such measures might include relying on a contractor to collect and dispose of the equipment, establishing a contract with the manufacturer to ensure disposal/recycling of unwanted computers.

Results

Reporting on total weight of waste

Reporting on total energy consumption

Information

The company has reported KPIs with regard to total energy consumption either through formal documentation or questionnaire declaration.

Guidance

Total energy consumed represents total primary energy consumption reported in kWh. Total energy consumed may include e.g. consumption of coal and coke (in Kg) reported in kWh and/or consumption of oil, LPG and electrical power in kWh.

Standard reporting on environmental issues

Information

There is evidence of formal reporting implemented regarding the management and the mitigation of the company environmental footprint from its supporting documentation, including key performance indicators (KPIs), statistical figures or associated concrete actions.

Guidance

Reporting items are standard in terms of quality and quantity, do cover the main issues, are meaningful enough, and are regularly updated. Examples of key performance indicators include total electricity consumption, electricity consumed per kg of product or per unit produced. Comprehensive reporting on environmental 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).

Improvement Areas (4)

Policies

Low

No quantitative target on environmental issues

Information

The company's policy does not contain quantitative objectives or targets on environmental issues.

Guidance

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 energy consumption reduction, percentage targets to reduce waste, or targets for a number of products to be eco-labelled. 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). Download the How-to Guide on this topic here (in English).

Actions

High Supporting documentation demonstrates a low level of coverage of environmental actions throughout the company operations

Information

The assessed company has a large workforce (over 1000 employees). According to information in supporting documentation and our research, there is a low level of deployment of environmental actions throughout the company (generally less than 20% of operational sites are covered by actions).

Guidance

Companies that have a large employee base and/or more than one operational site shall demonstrate that their environmental 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 an environmental management system's actions and certifications include (but are not limited to): - % of the total workforce across all locations who received training (internally or externally) on environmental issues - % of renewable energy out of total energy mix - % of total waste diverted from landfills, e.g. through recycling, reusing or WTE- % of all operational sites for which an environmental risk assessment has been conducted - % of all operational sites for which a formal environmental management system (EMS) has been implemented

Results

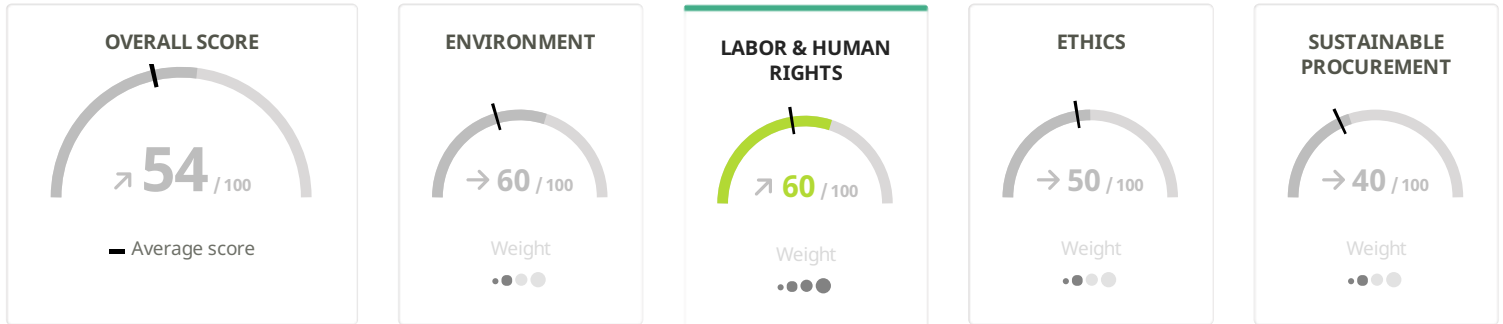
Medium Declares alignment with a widely recognized reporting standard, but no supporting documentation available

Low Declares external assurance of sustainability reporting, but no supporting documentation

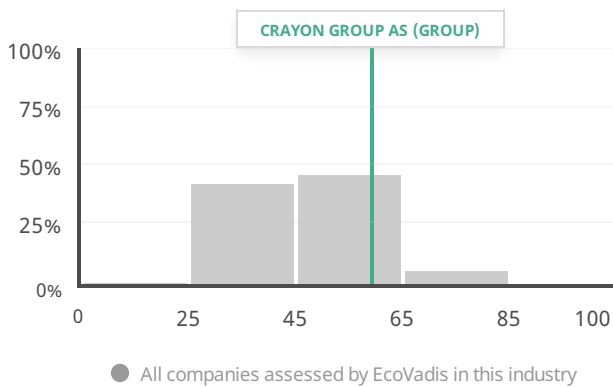
7. LABOR & HUMAN RIGHTS

This theme takes into account both internal human resources (e.g. health and safety, working conditions, career management) and human rights issues (e.g. discrimination and/or harassment, child labor).

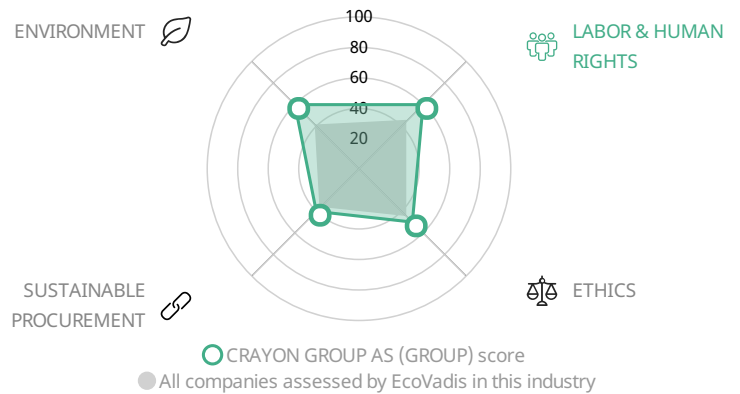
Labor & Human Rights Score Breakdown



Theme score distribution



Theme score comparison



Labor & Human Rights: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Labor & Human Rights: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.



Strengths (21)

Policies

Standard policy on a majority of labor or human rights issues

Information

A standard labor and human rights policy includes commitments and/or operational objectives on the main labor and human rights risks the company faces.

Guidance

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).

Endorsement of the United Nations Global Compact (UNGC)

Information

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The company is a formal signatory of this initiative.

Guidance

The United Nations Global Compact is a United Nations strategic policy initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. Companies sign the initiative and then are required to provide overviews of their management system through a mandatory disclosure framework (annual publication of a Communication on Progress [COP]).

Actions

Measures to promote gender and/or minority inclusion in the workplace

Employee stock ownership plan (not restricted to executive level)

Information

The company has provided supporting documentation of a stock ownership plan available to employees (not just executives).

Guidance

An employee stock ownership plan or program provides the company's workforce with an ownership interest in the company. This employee stock ownership program must apply to employees other than executives and/or directors. Most employees should have access to the stock ownership plan (although some requirements may apply, e.g. regarding seniority, etc.).

Bonus scheme related to company performance

Information

The company has implemented a bonus program that is related to company performance.

Guidance

It should be part of a robust employee contract to include a bonus scheme, but one that takes into account employee performance and company performance. The company has thus implemented a scheme of monetary remuneration for employees beyond base salary, linked to company performance. This is a form of motivation and it boosts the performance of employees.

Flexible organization of work available to employees (e.g. remote work, flexitime)

Information

The company has official measures to promote work-life balance in place, which have been found within the supporting documentation. The company provides flexible hours and organization for employees to work.

Guidance

The company has implemented working practices that acknowledge and aim to support the needs of staff in achieving a balance between their home and working lives. The company has supporting documentation showing a flexible organization of working hours is provided for employees, which can include evidence of options for part-time work, telecommuting or remote work, job-shares, and other forms of variable work schedules.

Health care coverage of employees in place

Whistleblower procedure on discrimination and harassment

Information

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.

Guidance

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.

Active measures for the prevention of musculoskeletal disorders

Information

The company actively implements measures to prevent musculoskeletal disorders

Guidance

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).

Emergency preparedness plan to all impacted employees (e.g. fire drills)

Information

The company has conducted an emergency preparedness plan to protect all impacted employees from potential hazards.

Guidance

Some potential examples of measures could include building evacuation drills ("fire drills"), sheltering from severe weather such as tornadoes, "shelter-in-place" from an exterior airborne hazard such as a chemical release and protective action when faced with an act of violence.

Specific labor or human rights certification [Environmental Lighthouse]

Information

The assessed company has a specific labor and human rights management system certificate.

Guidance

Specific labor and human rights management system certificates include AFAQ 26000, Intertek's Workplace Conditions Assessment Achievement Award, LUCIE, etc.

Employee representatives or employee representative body (e.g. works council)

Information

The company has implemented representation for employees in the form of elected employee representatives or a representative body.

Guidance

Social dialogue entails all types of negotiation, consultation or simply exchange of information between representatives of governments, employers and workers, on issues of common interest relating to economic and social policy. Employee representatives can include representatives who are freely elected by the workers of the company in accordance with provisions of national laws, or any union, works council or other agency or representative body recognized for the purposes of bargaining collectively on behalf of any employee. They are the point of contact between the workforce and management. They can/must be consulted by management on certain topics (e.g. collective redundancy).

Internal audits on health & safety issues

Information

The company carries out internal audits on health & safety issues

Guidance

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.

Employee health & safety detailed risk assessment

Information

The company carries out employee health & safety detailed risk assessments

Guidance

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.

Transparent recruitment process communicated clearly and formally to all candidates

Information

The company has a transparent recruitment process in place which is clearly and formally communicated to all candidates

Guidance

The company has a transparent hiring process in place which is communicated to all candidates. This includes, but is not limited to: having a clear job description, a process in place to respond to applicants after an interview, notification to candidates on potential background checks, etc. An open, transparent, and merit-based recruitment process ensures equal opportunities to the job applicants, free of any direct or indirect discrimination.

Regular assessment (at least once a year) of individual performance

Information

The company carries out regular assessments or appraisal of individual performance at least on a yearly basis for employees

Guidance

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 regular assessment process.

Active preventive measures for stress and noise

Information

The company has preventive measures in place against stress and noise

Guidance

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.

Provision of skills development training

Information

The company provides training to its employees to develop their skills

Guidance

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.

Specific measures implemented for the integration of employees with disabilities

Information

The company has implemented specific measures to integrate disabled persons into the workforce.

Guidance

Emerging studies determine that there is a true business case for the integration of disabled employees into the workforce beyond its roots as a socially responsible business practice. Evidence states that disabled employees have comparable productivity rates, lower accident rates, and higher job retention trends. People with disabilities also represent an untapped source of skills and talent, including technical skills if they have access to training and transferable problem-solving skills developed in daily life. Hiring disabled employees can contribute to the overall diversity, creativity and workplace morale. Some potential examples of implementation measures could include specific outreach techniques and programs, the provision of reasonable accommodation to meet individual needs, and allocating designated human resources management staff with knowledge on disadvantaged or work-related disability issues, etc. (source: ILO)

Training of relevant employees on health & safety risks and best working practices

Information

The company provides training to relevant employees on health and safety risks and best working practices

Guidance

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. 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.

Results

Reporting on the percentage of women in top executive positions

Information

The company reports, either through formal documentation or questionnaire declaration, on the percentage of women in executive positions (e.g. senior or top management).

Guidance

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.

Improvement Areas (5)

Policies

Low

No information whether health and safety policies also covers subcontractors working on the premises

Information

The health and safety policies provided by the company do not mention whether subcontractors are also covered by the policy.

Guidance

Companies who engage the services of contractors and subcontractors to undertake different tasks on their company premises should commit to protecting the health & safety of these workers. The company has a duty to ensure that all practical steps are taken to safeguard their safety by considering the nature of hazards that subcontractors could be exposed to and minimizing the risk of injury. The first step in mitigating these risks is to issue dedicated policies (detailed objectives and commitments) that cover subcontractors, or including subcontractors in the scope of the other health & safety policies issued by the company.

Low

No quantitative target on labor and human rights issues

Information

Company policy does not contain quantitative targets on labor and human rights issues.

Guidance

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).

Results

High

Basic reporting on labor and human rights issues

Information

There is some evidence of formal reporting on labor practices or human rights issues in the supporting documentation. It may include key performance indicators (KPIs), or statistical figures. However reporting elements may be limited in terms of quality or quantity, may not cover the main issues, or reporting is not regularly updated.

Guidance

Based on the information provided for the assessment, reporting does not cover a major portion of relevant issues. To improve the quality of reporting, KPIs could include injury rates, number of employees covered by social benefits, number of employees trained on discrimination, or the % of employees covered by collective bargaining agreements just to name a few. For more information on examples of specific labor and human rights related KPIs, please refer to the Global Reporting Initiative. Download the How-to Guide on this topic here (in English).

Medium

Declares alignment with a widely recognized reporting standard, but no supporting documentation available

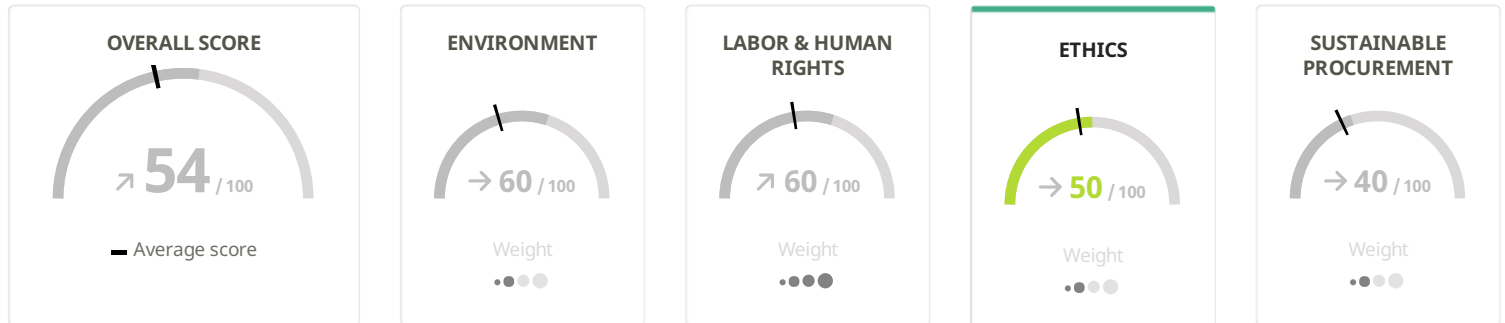
Low

Declares external assurance of sustainability reporting, but no supporting documentation

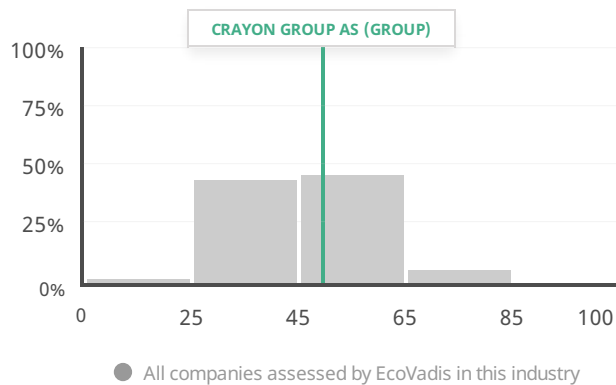
8. ETHICS

This theme focuses primarily on corruption and bribery issues, and also takes into account anticompetitive practices and responsible information management.

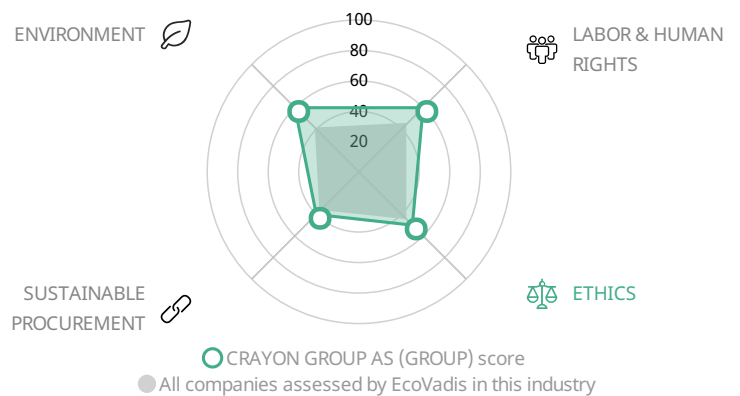
Ethics Score Breakdown



Theme score distribution



Theme score comparison



Ethics: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Ethics: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

Strengths (13)

Policies

Disciplinary sanctions to deal with policy violations

Information

There is evidence within the supporting documentation provided that the company has implemented structured mechanisms to deal with policy violations such as disciplinary actions.

Guidance

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).

Employee signature acknowledgement of ethics policies

Information

There is evidence within the supporting documentation provided by the company that it is mandatory for employees to sign their acknowledgement of the company's business ethics policies.

Guidance

Business ethics policies such as Code of Ethics/Code of Conduct should include a section requiring employees to sign (to ensure that all employees are aware of the policy).

Policy on information security

Information

The company has issued a formal standard policy that integrates commitments in the form of qualitative objectives on information security issues. The policy is formalized in a document such as a Code of Ethics and includes at least some organizational elements (e.g. review process, dedicated responsibilities, scope of application).

Guidance

It is imperative for companies who manage sensitive information to set commitments on the protection and responsible management of third-party data. The security of third party data encompasses the protection of customer personal identification information (PII) and the protection of third party intellectual property rights. Download the How-to Guide on this topic here (in English).

Policies on corruption

Information

There is a formal policy that integrates qualitative objectives/commitments on anti-corruption & bribery issues (including for example conflict of interest, fraud and money laundering) in the supporting documentation provided by the company.

Guidance

Corruption & bribery covers all forms of corruption issues at work namely extortion, bribery, conflict of interest, fraud, money laundering. A comprehensive policy is formalized in a standalone document or is part of a Code of Ethics/Conduct on the issues mentioned and incorporate as well 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).

Dedicated responsibility for ethics issues

Endorsement of the United Nations Global Compact (UNGC)

Information

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The company is a formal signatory of this initiative.

Guidance

The United Nations Global Compact is a United Nations strategic policy initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. Companies sign the initiative and then are required to provide overviews of their management system through a mandatory disclosure framework (annual publication of a Communication on Progress [COP]).

Actions

Incident response procedure (IRP) to manage breaches of confidential information

Whistleblower procedure to report ethics issues

Information

The company has implemented a formal whistleblower procedure which encourages employees (and external stakeholders) to report potential violations of the company's business ethics policies.

Guidance

A whistleblower procedure is a grievance mechanism for stakeholders to report any wrongdoings, concerns or breaches of the company business ethics policies. An effective whistleblower procedure must provide stakeholders with an identified communication channel to report their concerns, as well as protect the whistleblowers' confidentiality and rights to non-retaliation. The procedure may also be handled by a third party.

Awareness training on ethics issues

Information

The company has delivered awareness trainings on business ethics issues for its employees.

Guidance

Specific awareness or training programs are implemented to enable employees to identify and address the common business ethics issues that arise in a workplace. Such program may be conducted either online or in person, and should include regular audits to ensure the training effectiveness.

Periodic corruption risk assessments performed

Information

The company carries out periodic corruption & bribery risk assessments.

Guidance

Risk assessment are a formal process of evaluating and predicting the consequences (positive or negative) of a hazard and their likelihoods/probabilities. Periodic corruption and bribery risk assessments allow a company to identify potential bribery and corruption risks, rate the likely occurrence and the potential impact of the risks, select the appropriate anti-corruption controls, and develop an action plan. Such assessments ensure the presence of a strong compliance program and help to develop a more robust approach to counter bribery and corruption activities by the organization.

Measures to protect third party data from unauthorized access or disclosure

Information

The company has implemented measures to protect customer or client data from unauthorized access or disclosure.

Guidance

The company has taken measures to limit access to customer or client data within its own operation, or have implemented measures to secure its information system including such data so as to protect the data from unauthorized access or disclosure.

Third party anti-corruption due diligence program in place

Information

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.

Guidance

According to the Organization for Economic Cooperation and Development (OECD), third-party intermediaries (third parties) are people who help connect two or more trading partners, generally as “a conduit for goods or services offered by a supplier to a consumer. With globalization, there is now an increasing use of third parties. However, while companies benefit from the skills and resources of the intermediaries, they also become more vulnerable to risks such as bribery and corruption, conflict of interests, reputational damage, etc. Companies should therefore put in place compliance controls such as third-party due diligence procedures, training, certification, etc. to mitigate potential corruption risks.

Specific approval procedure for sensitive transactions (e.g. gifts, travel)

Information

The company has implemented a verification process for sensitive transactions.

Guidance

Sensitive transactions are a broad range of business dealings considered to be either illegal, unethical, or to reflect adversely on the integrity of the company. Some examples include (non-exhaustive) kickbacks, bribes, payoffs to influence decision affective a company's operations, etc. However, such transactions also comprise of facilitation payments which is usually made with the intention of expediting an administrative process. As such, a verification procedure is put in place to review and approve any sensitive transactions.

Improvement Areas (6)

Policies

Medium

Inconclusive documentation or only basic policy on anticompetitive practices

Information

The company has either no supporting documentation on qualitative objectives/commitments, or has only provided basic policy statements on anti-competitive practices issues that are relevant for a company in this sector, or has provided supporting evidence that was not approved due to quality/acceptance requirements. e.g. company name, recent date (8 years).

Guidance

A standard policy on anti-competitive practices is formalized as qualitative objectives/commitments in a formal policy document (e.g. Code of Ethics/Code of Conduct) and includes organizational elements (e.g. review process, dedicated responsibilities, scope of application). Download the How-to Guide on this topic here (in English).

Actions

Medium

No supporting documentation regarding third party due diligence on information security

Low

No supporting documentation regarding audits of control procedures to prevent corruption

Information

No company declaration and no supporting documentation evidence provided on audits of internal controls relating to anti-corruption issues within the company's own operations.

Guidance

Internal controls (for example four-eyes principle, job rotations, among others) are necessary to regularly monitor the effectiveness and proper implementation of actions put in place to support anti-corruption & bribery policies. Periodic audits of those controls, done either through an external third party that performs business ethics audits or an internal audit team, should be carried out to ensure their effectiveness and provide reasonable assurance that internal processes are being adhered to.

Results

High

No information on reporting on ethics issues

Medium

Declares alignment with a widely recognized reporting standard, but no supporting documentation available

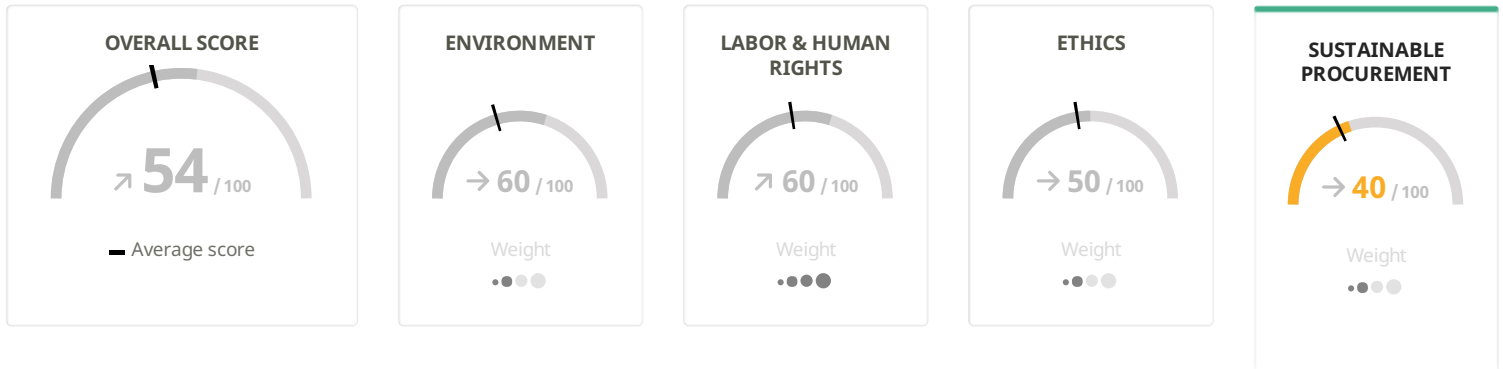
Low

Declares external assurance of sustainability reporting, but no supporting documentation

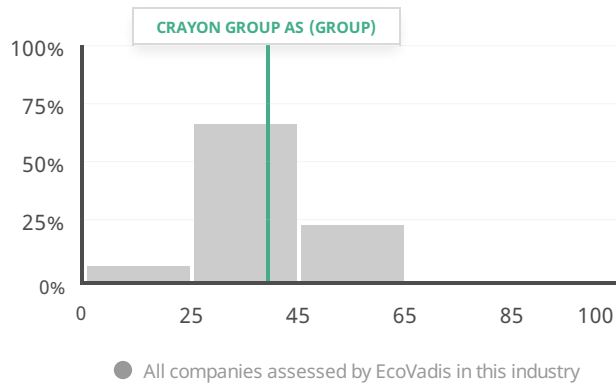
9. SUSTAINABLE PROCUREMENT

This theme focuses on both social and environmental issues within the company supply chain.

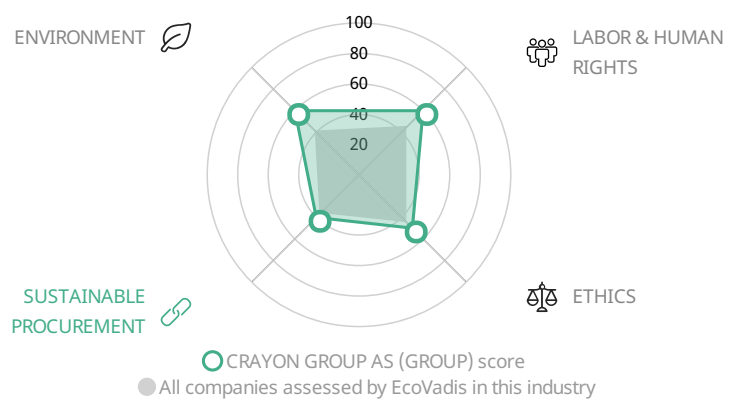
Sustainable Procurement Score Breakdown



Theme score distribution



Theme score comparison



Sustainable Procurement: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Sustainable Procurement: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' CSR performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.



Strengths (3)

Policies

Sustainable procurement policies on supplier environmental practices

Information

The company has formalized statements, commitments, and operational objectives on the management of its sustainable procurement policies, focusing on some material issues. The existing policy covers environmental issues in the company's supply chain.

Guidance

A standard sustainable procurement policy also covers social issues in addition to environmental issues in the supply chain. It also includes commitments and/or operational objectives designed to improve performance or mitigate risk. The policy is communicated to internal and external stakeholders through a formal dedicated document. Download the How-to Guide on this topic here (in English).

Actions

Regular supplier assessment (e.g. questionnaire) on environmental or social practices

Information

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.

Guidance

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.

Results

Reporting on Scope 3 emissions

Improvement Areas (7)

Policies

Medium

Inconclusive documentation or only basic policy on supplier social practices

Information

The company has either no supporting documentation on social issues in the supply chain, or has only provided evidence of basic policy statements that lack clear commitment to performance improvement, or has provided supporting evidence that was not approved due to quality/acceptance requirements. e.g. company name, recent date (8 years).

Guidance

A standard sustainable procurement policy on social issues on the supply chain includes commitments and/or operational objectives designed to improve performance or mitigate risk. It is communicated to internal and external stakeholders through a formal dedicated document. Download the How-to Guide on this topic here (in English).

Actions

High No information on a supplier CSR code of conduct

Information

No company declaration and no evidence within the supporting documentation on a supplier CSR code of conduct.

Guidance

A supplier CSR code of Conduct outlines the company's expectations on their suppliers' practices on the following topics: responsible environmental management, implementation of safe working conditions, treatment of their employees with respect and dignity, and ethical business practices. It can also include information on how the Code will be monitored and reviewed and how violations of the Code will be handled.

High No information on social or environmental clauses being included in supplier contracts

High No information on CSR risk analysis being conducted (i.e. prior to supplier assessments or audits)

Results

High Basic reporting on sustainable procurement issues

Information

There is some evidence of formal reporting on sustainable procurement issues in the supporting documentation. It may include key performance indicators (KPIs), or statistical figures. However reporting elements may be limited in terms of quality or quantity, may not cover the main issues, or reporting is not regularly updated.

Guidance

Based on the information provided for the assessment, reporting does not cover a major portion of relevant issues. To improve the quality of reporting, KPIs could be sector-specific and include for instance: % of suppliers assessed or audited on CSR issues, % of buyers trained on sustainable procurement, % of raw materials purchased that are recycled materials, % of products purchased with an eco-label (Source: Global Reporting Initiative G3). Download the How-to Guide on this topic here (in English).

Medium Declares alignment with a widely recognized reporting standard, but no supporting documentation available

Low Declares external assurance of sustainability reporting, but no supporting documentation

10. 360° WATCH FINDINGS

20 March 2020

No records found for this company on Compliance Database

null

→ No score impact

360° Watch Findings comprise relevant public information about companies' CSR practices that have been identified via more than 2,500 data sources (including NGOs, press and trade unions). 360° Watch Findings are incorporated into the EcoVadis assessment and can have positive, negative or no score impact.


EcoVadis is connected to the following international sources:


- CSR networks and initiatives (e.g. AccountAbility, Business for Social Responsibility, CSR Europe)
- Trade unions and employers' organizations
- International organization (e.g. United Nations, European Court of Human Rights, Global Compact, International Labor Organization, World Bank)
- NGOs (e.g. China Labor Watch, Greenpeace, WWF, Movimento Difesa del Cittadino)
- Research institutes and specialized press (e.g. CSR Asia, Blacksmith Institute, Corpwatch)


11. SPECIFIC COMMENTS


Additional comments from our CSR analysts pertaining to the assessment.

Specific comments

 The company is not included in any compliance-related watch lists or sanction lists.

 There is a lack of reporting on KPIs relating to ethics, this is of concern given the company's size, activities and locations.

 The implementation coverage of CSR measures and actions throughout the company is unclear.

 Since the last assessment, the overall score has increased thanks to the implementation of additional policies.

12. CONTACT US

Any questions or need help? Visit our Help Center at support.ecovadis.com

APPENDIX:

INDUSTRY RISK PROFILE

Discover the primary CSR risks, regulations, hot topics and best practices related to specific industries.

EcoVadis determines industry based on the 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. Its 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.

It is possible that a company has operations in more than one industry. In these cases, EcoVadis classifies companies based on their main area of operation, as determined by CSR risk and/or total revenue.

CRITERIA ACTIVATION BY THEME:

Discover the primary CSR risks, regulations, hot topics and best practices related to specific industries.

Environment

Medium	Energy consumption & GHGs
Non-activated	Water
Non-activated	Biodiversity
Non-activated	Local & Accidental Pollution
Medium	Materials, Chemicals & Waste
Non-activated	Product Use
Non-activated	Product End-of-Life
Non-activated	Customer Health & Safety
Non-activated	Environmental Services & Advocacy

Labor & Human Rights

Medium	Employee Health & Safety
Medium	Working Conditions
Medium	Social Dialogue
Medium	Career Management & Training
Non-activated	Child Labor, Forced Labor & Human Trafficking
High	Diversity, Discrimination & Harassment
Non-activated	External Stakeholder Human Rights

Ethics

Medium	Corruption
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Medium

Anticompetitive Practices

Medium

Responsible Information Management

Sustainable Procurement



Medium

Supplier Environmental Practices

Medium

Supplier Social Practices

KEY CSR ISSUES

Find qualitative explanations of the key CSR issues and risk associated with Computer programming, consultancy and related activities

 Environment

Importance

CSR issue

Medium

Energy consumption & GHGs

Definition

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

Industry issues

The nature of the activities in the sector requires a dependence on IT devices, significant office space, and the transport of employees. The use of energy-efficient equipment (e.g. Energy Star labelled), purchase of green/renewable power, and employee awareness programs are additional measures to consider when managing energy consumption in large commercial facilities. In order to reduce GHG emissions from transport, companies engaged in computer programming (as with all businesses) should promote the use of web-based conferencing and eco-friendly transport options for employees.

Medium

Materials, Chemicals & Waste

Definition

Consumption of all types of raw materials and chemicals. Non-hazardous and hazardous waste generated from operations. Also includes air emissions other than GHG (e.g. SOx, NOx).

Industry issues

Waste emissions in this sector, particularly IT and electronics waste, have a significant impact on the environment when not disposed of appropriately. Much of the waste that is generated through systems upgrades, including computer equipment, printer cartridges and toners are subject to stringent regulations (e.g. WEEE in Europe), and therefore should be managed effectively to regulatory compliance requirements. Additional waste streams common for companies engaged in IT related business include paper and other sources of general office waste, all of which should be recycled or disposed of safely. The collection and recycling of e-waste is important for sector sustainability; therefore, IT firms should develop internal waste management awareness programs and recycling systems.

 Labor & Human Rights

Importance

CSR issue

Medium

Employee Health & Safety

Definition

Deals with health and safety issues encountered by employees at work i.e. during operations and transport. Includes both physiological and psychological issues arising from, among others, dangerous equipment, work practices and hazardous substance.

Industry issues

Given that companies engaged in programming, consultancy and related activities have no manufacturing activities, health and safety issues are limited to stress and psychological issues, and repetitive strain due to non-ergonomic work stations. Health and safety programs should be developed that include training employees in stress and ergonomic management to avoid high rates of employee absenteeism.

Medium

Working Conditions

Definition

Deals with working hours, remunerations and social benefits granted to employees.

Industry issues

According the PwC, given the opportunity, 64% of Millennials (and 66% of non-Millennials) would like to occasionally work from home(3). Apart from standard working conditions applicable to any activity (e.g. working hours, holidays, wages and benefits), companies engaged in computer programming and consulting activities face non-specific issues due to the manufacturing activity involving employees. Measures such as shift allowance, personal & medical insurance can be implemented to improve work/life balance by reducing the consequences of their position in their life outside of work. However, computer programming and consulting companies with operations (contracting discussed in SUP2) in identified high risk countries, particularly India where IT related industries are well developed, should certainly respect local labor laws, but adhere to international norms as they are more rigorous and supportive of workers.

Medium

Social Dialogue

Definition

Deals with structured social dialogue i.e. social dialog deployed through recognized employee representatives and collective bargaining.

Industry issues

The Global poll 2012 led by the International Trade Union Confederation (ITUC) 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(4). A sound and structured social dialog is thus of importance.

Medium

Career Management & Training

Definition

Deals with main career stages i.e. recruitment, evaluation, training and management of layoffs.

Industry issues

Although the computer programming sector has a skilled workforce, career management and training is a key issue to maintain a skilled workforce. Training programs should be implemented by companies to address rapid changes occurring in the IT field, particularly developments in data security and management. Human error has been blamed, by some accounts, for 35 percent of data breaches in recent years, which reaffirms the need for professional development programs in companies involved in programming(2). Additionally, career management strategies are important for both companies and employees that want to explore a broad range of fields associated with the IT field.

High

Diversity, Discrimination & Harassment

Definition

Deals with discrimination and harassment prevention at the workplace. 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. Harassment may include physical, psychological and verbal abuse in the work environment.

Industry issues

Promoting diversity through non-discrimination policies and practices has positive impacts on both workplace motivation and has been shown to Diversity at work on the other hand is believed to have positive impacts on companies' financial performance. When effective non-discrimination policies not in place however, companies risk financial penalties in countries that have laws and regulations prohibiting discrimination based on various personal characteristics. There is a general lack of women in the IT sector companies, therefore companies should establish proactive measures promoting additional women in the workforce(5). There is a considerable amount of international mobility in this sector; therefore, human rights impact assessments should be performed to identify regulations regarding anti-discriminatory practices in order to establish HR processes that address the issue.



Ethics

Importance

CSR issue

Medium

Corruption

Definition

Deals with all forms of corruption issues at work, including among other things extortion, bribery, conflict of interest, fraud, money laundering.

Industry issues

Corruption and bribery issues are major issues for any company, particularly when operating in risk countries. Regulations such as the Foreign Corrupt Practice Act (FCPA) in the US address these issues and make it unlawful to make payments to assist in obtaining or retaining business. Collusion, bribery and conflicts of interest between software manufactures/publishers and large-scale IT consultant firms can undermine sustainable IT program development goals when consultants place the interests of 3rd parties above the interests client's sustainability needs.

Medium

Anticompetitive Practices

Definition

Deals with anti-competitive practices including among others: bid-rigging, price fixing, dumping, predatory, pricing, coercive monopoly, dividing territories, product tying, limit pricing, and the non respect of intellectual property.

Industry issues

Modern information technology has significantly increased the risk of industrial espionage and the theft of commercial information. Employees in sectors in this category are hired to perform tasks that grant them access to significant information streams, much of which is non-public and strategic in nature. Companies engaged the in computer programming should emphasize intellectual property protection in their Codes of Conduct, provide a whistle-blowing system, and extensively train employees about the value of intellectual property protection in company performance sustainability.

Medium

Responsible Information Management

Definition

Deals with third-party data protection and privacy which encompasses the protection of customer personal identification information (PII) and third party intellectual property rights.

Industry issues

Companies collect, process and share confidential information belonging to third-parties in order to operate their business. Third-party confidential information includes employee and consumer personal identification information, third parties' intellectual property, and business partner trade secrets. Companies are legally mandated in several jurisdictions to manage third party data responsibly. Breaches of third-party data, including proprietary intellectual property, trade secrets and employee and consumer PII expose companies to operational seizures, financial and reputational impacts caused by stakeholder lawsuits and regulatory penalties. The financial impacts of information security breaches can be both immediate and drawn out over several years, due to possible litigation action by parties who lost confidentiality of their information entrusted to the breached company. The costs of regulatory violations remain severe, and proposed changes to major regulatory frameworks in major countries are likely to impose greater fines. Ponemon Institute estimates the global average cost of a cyber-attack to be US\$3.86 million(6). Given the functional access that computer programmers have to customer data streams, companies engaged in computer programming must prioritize data security. Employees hired to perform computer programming are entrusted with information that can expose not only clients to IP theft, but also the clients' customers' data and IP. Investigations into recent customer data security breaches have uncovered the involvement of computer programmers in data theft schemes, though usually internal programmers(7). Companies engaged in computer programming, especially in a consultative capacity, must place an emphasis on data security and privacy in their Codes of Conduct, provide a whistle-blowing system, include data security in employee training, and update systems and processes to meet the ISO 27000 standards.



Sustainable Procurement

Importance

CSR issue

Medium

Supplier Environmental Practices

Definition

Deals with environmental issues within the supply chain i.e. environmental impacts generated from the suppliers and subcontractors own operations and products.

Industry issues

Due to the significant demand for IT equipment that computer programming companies maintain to perform their job functions, sustainable procurement is important for the sustainability of the industry. Companies engaged in computer programming and other IT activities rely heavily on products that have significant harmful effects on the environment throughout the life cycles of the products. Computer upgrades should therefore take into account environmental impacts by purchasing equipment that has a higher quantity of recyclable parts, low emissions of noise and radiation, and packaging that is easily recyclable or reusable. When available for specific products, companies can verify the specifications and eco-impacts through certification bodies (e.g. Energy-Star).

Medium

Supplier Social Practices

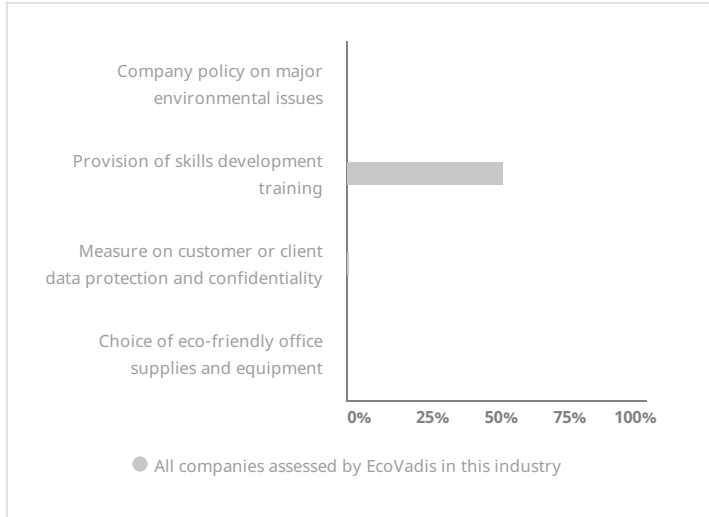
Definition

Deals with labor practices and human rights issues within the supply chain i.e. labor practices and human rights issues generated from the suppliers and subcontractors own operations or products.

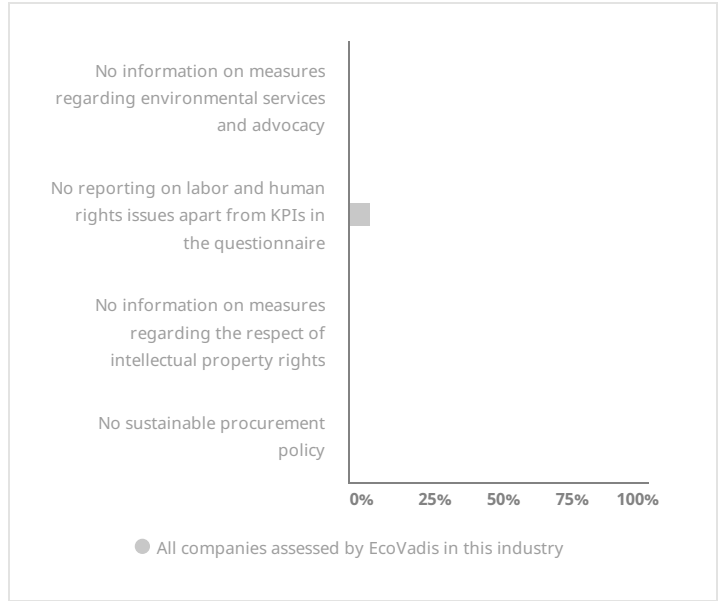
Industry issues

The manufacturing process of electronics has, for many years, been a source of substantial labor and human rights abuses, particularly in identified high risk countries. Factory workers are exposed to hazardous chemicals and dangerous machinery that, when located in identified high risk countries, is neglected due to weak local health and safety regulations. To exacerbate the situation at this level of the electronics supply chain, most of the manufacturing for this sector is performed in identified high risk countries. While industry initiatives (notably the Electronics Industry Citizen Coalition) have been developed with the goal of eradicating labor and human rights abuses, issues still remain that require the attention of companies engaged in the IT programming sector in order to gain visibility of their supply chains. External are effective information gathering tools, as are the collaborative efforts to promote whistle-blowing systems.

Key industry Strengths



Key industry Improvement Areas



CSR KPIs Overview

KPI	All companies assessed by EcoVadis in this industry
Active whistleblowing procedure in place	31%
Audit or assessment of suppliers on CSR issues	27%
Carbon disclosure project (CDP) respondent	6%
Formal code of business ethics OUTDATED	47%
Global Compact Signatory	9%
ISO 14001 certified (at least one operational site)	30%
OHSAS 18001/ISO 45001 certification or equivalent (at least one operational site)	19%
Policy on sustainable procurement issues	21%
Reporting on energy consumption & GHGs	39%
Reporting on health & safety indicators	34%

Main Regulations and Initiatives

Certification 80 PLUS

<http://www.80plus.org/>

80 PLUS is an electric utility-funded incentive program to integrate more energy-efficient power supplies into desktop computers and servers.

 **Environment**

Label de responsabilité sociale des call centers - Association Française de la Relation Client

<http://www.afrc.org/pageLibre000100d4.php>

Ce "label responsabilité sociale" propose une alternative à une logique axée sur la recherche systématique d'optimisation des coûts.

 **Labor & Human Rights**

The Green Grid

<http://www.thegreengrid.org/>

The Green Grid Association is a 501(c)6 non-profit, open industry consortium of end users, policy makers, technology providers, facility architects, and utility companies that works to improve the resource efficiency of information technology and data centers throughout the world. With more than 175 member companies around the world, The Green Grid seeks to unite global industry efforts, create a common set of metrics, and develop technical resources and educational tools to further its goals.

 **Environment**

ISACA - Code of Professional Ethics

<http://www.isaca.org/Certification/Code-of-Professional-Ethics/Pages/default.aspx>

ISACA is a global network of more than 100,000 members covering a variety of professional IT-related positions. ISACA sets forth a Code of Professional Ethics to guide the professional and personal conduct of members of the association and/or its certification holders.

 **Ethics**

Universal Declaration of Human Rights

<http://www.un.org/Overview/rights.html>

 Regulatory

The Universal Declaration of Human Rights (UDHR) is an advisory declaration adopted by the United Nations General Assembly (10 December 1948)

 **Labor & Human Rights**

EU directive EuP (Energy using Products)

http://ec.europa.eu/enterprise/eco_design/index_en.htm

 Regulatory

The directive 2005/32/EC became law in the European Union on August 2005. The EuP Directive focus on the design phase to improve energy efficiency of energy using products.

 **Environment**

Label Energy Star

<http://www.energystar.gov/>

Energy star is a voluntary labeling program designed to identify and promote energy efficient products. It was first created as a United States government program, but Australia, Canada, Japan, New Zealand, Taiwan and the European Union have also adopted the program.

 **Environment**

Charte de la diversité en entreprise (French Diversity Charter)

<http://www.diversity-charter.com/>

The Diversity Charter is a written commitment that can be signed by any company, regardless of its size, that wishes to ban discrimination in the workplace and makes a decision to work towards creating diversity.

 **Labor & Human Rights**

Standard ISO 14000 (International Standard Organisation)

http://www.iso.org/iso/iso_14000_essentials

The ISO 14000 family addresses various aspects of environmental management

 **Environment**

International Labor Organization's Fundamental Conventions

http://www.ilo.org/wcmsp5/groups/public/--ed_norm/--declaration/documents/publication/wcms_095895.pdf

 Regulatory

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.

 **Labor & Human Rights**

Standard OHSAS 18001 (Occupational Health and Safety Assessment Series)

<http://www.ohsas-18001-occupational-health-and-safety.com/index.htm>

OHSAS 18000 is an international occupational health and safety management system specification.

 **Labor & Human Rights**

United Nations Convention against Corruption (UNCAC)

<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

 Regulatory

The UNCAC is the first leg12y 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.

 **Ethics**

OECD guidelines for multinational enterprises

http://www.oecd.org/about/0,2337,en_2649_34889_1_1_1_1_1,00.html

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.

 **All themes**

Standard ISO 26000 (International Standard Organisation)

<http://www.iso.org/iso/pressrelease.htm?refid=Ref972>

The future International Standard ISO 26000, Guidance on social responsibility, will provide harmonized, glob12y 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.

 **All themes**

Foreign Corrupt Practices Act of 1977

<http://www.usdoj.gov/criminal/fraud/fcpa/>

 Regulatory

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.

 **Ethics**

United Nations Global Compact (10 principles)

<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>

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:

 **All themes**

Standard Global Reporting Initiative's (GRI)

<http://www.globalreporting.org/Home>

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.

 **All themes**

Carbon disclosure project

<https://www.cdp.net>

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.

 **Environment**

Sources

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