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REPORT TO THE GOVERNOR
AND THE LEGISLATURE AS
REQUIRED BY
P.L. 1987, c.177
(Report on corporations
doing business in Northern Ireland
whose securities are held by the State
pension funds)

P.L. 1987, c.177 requires the Division of Investment to file a report by January 15 of each year regarding the adherence of United States corporations or their subsidiaries doing business in Northern Ireland, in which the assets of any State pension fund or annuity fund are invested, to various principles stated in the law and collectively known as the MacBride Principles.

The law further provides that the Division may use information disseminated by independent agencies if, in the opinion of the State Investment Council, the information satisfies the requirements of the law.

We utilize Institutional Shareholder Services, Inc. ("ISS"), an indirect wholly-owned subsidiary of MSCI Inc., as the source of information to identify those United States corporations doing business in Northern Ireland and to provide reports on their adherence to the principles set forth in the law.

Attached hereto as Exhibit I is the report prepared by ISS, dated December 2011.


Timothy M. Walsh
Director

Attachments

MSCI

ESG Research

Northern Ireland Report

State of New Jersey Division of Investment

December 2011

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The following is a report on companies with operations in Northern Ireland in the New Jersey Division of Investment (NJDI)'s holdings, as provided by NJDI to MSCI ESG Research in November 2011.

MacBride Principles Background

The nine MacBride Principles are cited in New Jersey P.L. 1987, Chapter 177 in their unamplified form, as follows:

1. Increasing the representation of individuals from underrepresented religious groups in the work force including managerial, supervisory, administrative, clerical and technical jobs.
2. Adequate security for the protection of minority employees both at the workplace and while traveling to and from work.
3. The banning of provocative religious or political emblems from the workplace.
4. All job openings should be publicly advertised and special recruitment efforts should be made to attract applicants from underrepresented religious groups.
5. Layoff, recall and termination procedures should not in practice favor particular religious groupings.
6. The abolition of job reservations, apprenticeship restrictions, and differential employment criteria, which discriminate on the basis of religion or ethnic origin.
7. The development of training programs that will prepare substantial numbers of current minority employees for skilled jobs, including the expansion of existing programs and the creation of new programs to train, upgrade and improve the skills of minority employees.
8. The establishment of procedures to assess, identify and actively recruit minority employees with potential for further advancement.
9. The appointment of a senior management staff member to oversee the company's affirmative action efforts and the setting up of timetables to carry out affirmative action principles.

Northern Ireland Research Background

MSCI ESG Research on companies in Northern Ireland includes an overview of fair employment facts that relate to the parent company's operations in Northern Ireland, including:

- whether the company has an agreement in place related to the implementation of the MacBride Principles;
- whether there is evidence of underrepresentation of Catholics or Protestants at any of the company's operations in Northern Ireland, and whether the company is taking any affirmative action, and;
- the number (if any) of Fair Employment Tribunal discrimination findings and/or settlements.

The MacBride agreement heading refers to agreements between proponents of the MacBride principles and the companies. To reach such agreements, the companies generally say they are implementing MacBride to the extent they can lawfully do so, and agree to cooperate with independent monitoring of

their operations, usually after activists have sponsored a shareholder resolution to the company on the subject.

For each subsidiary or affiliate, the facility name, location, and business line are stated, along with an assessment of whether any underrepresentation exists (and for which group) at the operation, and the employee breakdown. Percentages of Catholics and Protestants in each work force are provided, although no conclusions are drawn from a work force with fewer than 25 employees. The percentages of Catholic and Protestant employees are calculated based on the total number of employees with identified religious affiliation, and are taken from the annual Equality Commission of Northern Ireland Monitoring Report. Subheadings in the remainder of each profile indicate:

- the extent of the company's response to MSCI ESG Research's 2011 Northern Ireland Screen survey;
- the quality and source of information available;
- compliance with Northern Ireland's fair employment law and Code of Practice;¹
- whether there is evidence that Catholics and Protestants are fairly represented;
- the company's position on the MacBride principles;
- any affirmative action the company is undertaking;
- any discrimination complaints filed against the company at the Fair Employment Tribunal since 2003.

The profiles refer to two government agencies in Northern Ireland:

- The Equality Commission for Northern Ireland, which is an independent public body established under the Northern Ireland Act 1998, with the mission of advancing equality, promoting equality of opportunity, encouraging good relations and challenging discrimination through promotion, advice and enforcement; and
- The Fair Employment Tribunal (FET), which is the independent judicial body in Northern Ireland that hears and determines complaints of discrimination on the grounds of religious belief or political opinion.

¹ The Fair Employment and Treatment (Northern Ireland) Order 1998, is an act of the British parliament. The detailed Code is authorized by the British government. It spells out legal requirements and makes recommendations to employers for best practice in this area.

Northern Ireland Company Profiles

3M Company

Operations in Northern Ireland:

3M (UK) PLC

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Yes	FET Settlements	0

3M (UK) PLC

Location	Bangor, North Down
Business	Adhesive tapes manufacture
Employees	(Data as of 2011)
	Protestant 131
	Catholic 18
	Other 5
	Total 154

2010 Survey Response: None

Available information: 3M (UK) PLC is engaged in adhesive tape manufacturing at its Bangor location in County Down.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, the company continued to provide awareness in fair employment practices for its employees. The plant's senior management team has developed fair employment training programs in conjunction with the Equality Commission, and the company has provided its managers with awareness training on equal opportunity, fair employment and sectarian harassment and intimidation. In addition, all employees have been trained in equality awareness and sectarian harassment. 3M also has an exit survey that specifically gathers information on fair employment. The company reported that all employees leaving the company have been aware of the equal opportunities policies. The company's management oversight of equality issues at its Northern Ireland plant appears to have received specific, sustained attention from U.S. corporate management.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at 3M's operations in Northern Ireland. According to the Equality Commission's 2010 Monitoring Report, 3M's workforce consisted of 131 Protestants (87.9 percent), and 18 Catholics (12.1 percent). The company is engaged in the manufacture of adhesive tapes. This mostly requires low skilled workers, who are most like to come from nearby areas. As a result, the North Down district council area (85.3 percent Protestant) was deemed the most appropriate point of comparison.

Conformance with MacBride principles: In July 2008, 3M told MSCI that its policies continued to reflect the fair employment standards embodied in the MacBride Principles. The company reached an agreement with shareholder activists on implementation of the MacBride Principles in 1996. The

implementation of the MacBride Principles was considered a key area of responsibility for local managers.

Affirmative action outreach: As of December 2011, the company continued its efforts to provide affirmative action to the underrepresented community. In early 2004, the company noted that some of its outreach initiatives have been scaled back. However, the company continued to support some activities in the minority community, such as work placement weeks and art competitions. In 1997, 3M reached an affirmative action agreement with the Equality Commission, which included a target of increasing the Catholic proportion of applicants and appointees to at least 11 percent by 1999, and an overall goal of increasing the Catholic representation of its manual work force to 11 percent. 3M met these goals and generally has exceeded its target for Catholic applicants. It began welcoming both communities to apply in 1996. The company's school outreach program included industry awareness days, recruitment fairs, and work experience/placement schemes in which secondary school students visit the company for a week. In addition, 3M reported that it sponsored an annual weekend team building retreat with 20 Catholic and 20 Protestant school children to enhance community relations with the company. Outreach to Catholics also included sponsoring teams of the Catholic Gaelic Athletic Association.

Chill factor and neutral workplace: As of December 2011, the company continued to discourage its employees from engaging in activities that might be construed as having sectarian implications. In addition, the company continued to provide training for its employees on sectarian harassment. The company also had procedures in place to handle harassment, and religious or political grievances from its employees.

The company has banned the wearing of football soccer shirts in the plant, since allegiance to certain teams in Northern Ireland can be extremely sectarian. The company continued to prohibit the display of flags and emblems through a Joint Declaration of Protection most recently signed in April 1996 by the Bangor site manager and a union representative; No problems appeared to have surfaced with this neutral workplace policy. All employees received specific training on sectarian harassment in the workplace. The company also stated that workers have not reported experiencing intimidation or harassment of a religious or political nature in any of 3M's exit surveys. The site of the company's operations is close to parade routes during the summer marching season, which could prove uncomfortable for Catholic employees. However, the facility is closed for two days during the height of the season.

3M developed its formal harassment policy, which includes a complaints procedure, in consultation with the Equality Commission and employee representatives. The policy provided employees who have a religious or political grievance, with access to a co-religionist staff. It also called for the initiation of the company's disciplinary procedure if the facts warranted it. Managers noted that the average tenure at the facility was 15 years. As a result, coworkers know each other well and the atmosphere was usually relaxed. The company also disclosed that it regularly reviewed its harassment policy periodically with employees as a preventive measure.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Abbott Laboratories

Operations in Northern Ireland:

Abbott Laboratories Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	6/1/2001	Affirmative Action	Unknown	FET Settlements	0

Abbott Laboratories Ltd.

Location	Employees work from home
Business	Pharmaceutical, health care and diagnostic products
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u> </u>
	Total

2010 Survey Response: None

Available information: Abbott Laboratories has not responded to the Northern Ireland Service survey since 2009. Employment has been falling, from 16 in 2002 to less than 10 as of 2011. Abbott employees in Northern Ireland work from home and report to a head office in England.

Compliance with Northern Ireland fair employment law and Code of Practice: As of May 2007, the company enforced a worldwide code of conduct. The code included sections on equal employment and workplace harassment. In addition, the code specifically indicated that the company will not discriminate based on a range of characteristics, including religion and nationality. The company's description of its Northern Ireland Equal Employment Opportunity (EEO) policy indicated that the policy complied with local requirements; the policy was overseen by an Abbott human resources manager based in England.

Underrepresentation analysis: Abbott Laboratories neither appeared in the 2011 Register of Employers nor in the 2010 Equality Commission's Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In May 2007, the company told MSCI that its employees "have a great deal of independence" as they worked from their homes, and had concluded that "the MacBride Principles would be difficult to apply." However, the company said its policies reflect the fair employment standards embodied in the MacBride Principles, and added that the company was willing to respond in full to the Northern Ireland Service annual survey.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Abbott employees did not face chill factor since they work from home.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

AES Corporation

Operations in Northern Ireland:

AES Kilroot Power

AES Ballylumford

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	Yes		
Agreement Date	4/1/1996	Affirmative Action	Yes	FET Settlements	0

AES Kilroot Power

Location	Carrickfergus
Business	Electricity generation
Employees	(Data as of 2011)
	Protestant 111
	Catholic 17
	Other 1
	Total 129

2010 Survey Response: None

Available information: AES Kilroot Power operates a 300 MW coal and oil fired power plant in Carrickfergus, Northern Ireland and is considered to be one of the top 100 employers in the province.

Compliance with Northern Ireland fair employment law and Code of Practice: In October 2009, AES told MSCI that the Northern Ireland senior management oversaw the company's equality policy. The company did not publicly advertise all openings. Job openings were posted in the Belfast Telegraph and on the Internet. It also reported that its employees were notified of internal job openings. The company used an interview panel when selecting new hires, but it did not guarantee that both communities were represented. The company also met regularly with the Equality Commission.

According to MSCI's previous analysis, the company generally appeared to adhere to recommendations of the Code of Practice, including including implementation affirmative action measures which the Code encourages. The company used systematic hiring and selection procedures and maintained an equal opportunities program. Employee team leaders managed fair employment issues. AES reported that all team leaders have had EEO awareness training. The company said that the training would be updated if changes in legislation occur. The team leaders were responsible for recruitment, selection, training and performance reviews.

As of November 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, Catholics were underrepresented at AES Kilroot Power compared to the whole of Northern Ireland (42.7 percent Catholic, 57.3 percent Protestant). According to the 2010 Equality Commission's Monitoring Report, AES Kilroot Power's workforce consisted of 17 Catholics (13.3 percent), and 111 Protestants (86.7 percent). The company is engaged in electricity generation. Considering the type of business, all of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In 1996, AES agreed to implement those MacBride principles that are "lawfully in line" with fair employment legislation in Northern Ireland.

Affirmative action outreach: In October 2009, AES Kilroot told MSCI that it continued to have an affirmative action agreement with the Northern Ireland Equality Commission. Goals and timetables have been set for recruitment and/or promotion of the underrepresented group. However, no additional details were provided by the company.

Chill factor and neutral workplace: Managers acknowledge that there has been a chill factor for Catholics that plays a role in their underrepresentation at the company. Northern Ireland Electricity, the predecessor company, received much criticism from the nationalist community over the years for alleged discrimination against Catholics. NIE and the purchasers of NIE power plants, including AES, are trying to combat that image. AES managers believe they have established a neutral work environment, but they acknowledge that many members of the Catholic community feel the power stations are a Protestant domain, as they were in the past. AES has tried to emphasize that it is a new company making a decisive break with the past corporate culture. AES and its trade unions have a Joint Declaration of Protection that pledges cooperation on equal employment goals, and supports the right to work without fear of intimidation or harassment.

As of November 2011, this was the most recent information available. The company had not provided any new information to MSCI since 2009.

Grievances: No recent complaints have been filed against AES Kilroot at the Fair Employment Tribunal as of December 2011. In December 2009, the company told MSCI that its grievance policy allowed employees to file complaints confidentially and to raise issues to someone other than their immediate supervisor.

AES Ballylumford

Location	Larne, Co. Antrim
Business	electricity generation
Employees	(Data as of 2011)
	Protestant 141
	Catholic 24
	Other 7
	<u>Total 172</u>

2010 Survey Response: None

Available information: AES Ballylumford (formerly Premier Power) is involved in electricity generation in Northern Ireland. In August 2010, AES bought Ballylumford Power Station from BG Group. AES has provided response to the MSCI survey in January 2011. The company was previously owned by Northern Ireland Electricity, a public utility, until it was privatized in 1992.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, AES Ballylumford had detailed fair employment policies that appeared to adhere closely to practices recommended in Northern Ireland's fair employment laws and Code of Practice. It has

provided copies of all its policies, which it updated in 2005, as part of past survey responses. These policies incorporated feedback from trade unions and were based on model policies from the Equality Commission. AES Ballylumford has submitted regular progress reports about its compliance with an affirmative action agreement it has had with the Equality Commission since 1997.

The company's formal redundancy procedure included a consultation process with trade unions. The process included discussion of selection procedures and their impact on the work force. The company regularly reviewed all the human resources' best practices principles and policies when changes were warranted.

When it had vacancies, the company advertised them widely to ensure they reach members of both communities. Employees were always informed of internal job openings. The company also used recruitment and selection procedures that were systematic and objective. In January 2011, the company told MSCI that it occasionally used a panel of interviewers to select candidates. Members of this panel have all received training in fair employment issues and selection procedures.

The company's equal opportunities policy said that the company would provide equal employment opportunity to all irrespective of a wide range of personal characteristics, including "religious belief, political opinion or nationality." In its January 2011 survey response, AES Ballylumford told MSCI that the Northern Ireland senior management continued to be responsible for supervising the company's equality policy. The company regularly provided training to all managers to inform them of their equality duties. Employees who violated the equal opportunities or harassment policies may be subject to disciplinary procedures.

Underrepresentation analysis: As of February 2011, Catholics were underrepresented at AES Ballylumford compared to the whole of Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, AES Ballylumford's workforce consisted of 24 Catholics (14.5 percent), and 141 Protestants (85.5 percent). The company is engaged in electricity generation. Considering its type of business, all of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In January 2011, AES Ballylumford told MSCI that its employment policies were compliant with the MacBride Principles.

Affirmative action outreach: In January 2011, AES Ballylumford told MSCI that it continued to have an affirmative action agreement with the Northern Ireland Equality Commission. In 1997, the company agreed with the Equality Commission to increase Catholic representation. As part of this agreement, AES Ballylumford ads carried statements acknowledging the underrepresentation of Catholics and welcoming applications from the community. It also ensured that its employment ads run in newspapers, such as the Irish News, that cater mainly to Catholics.

Chill factor and neutral workplace: As of December 2011, no chill factor concerns exist at AES Ballylumford. Although its location in Larne may be intimidating for Catholics, the company has sufficient policies in place. AES Ballylumford's equal opportunities and harassment policies prohibited the display of sectarian materials. No form of intimidation or harassment would also be tolerated. It has circulated its policies throughout the workplace and has provided equal opportunity employment training to managers and supervisors. It also had a confidential external counseling service available to employees and their families.

Grievances: AES Ballylumford was one of the defendants in a claim at the FET (153/08FET) filed in September 2008. In January 2011, AES Ballylumford told MSCI that the case was dismissed after withdrawal on April 20, 2009. No new complaints have been filed against the company as of December 2011.

AES Ballylumford has formal grievance procedures in place that allow workers to voice complaints without fear of victimization.

American International Group, Inc.

Operations in Northern Ireland:

AIG Europe (UK) Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	9/1/2004	Affirmative Action	Unknown	FET Settlements	0

AIG Europe (UK) Ltd.

Location	Belfast
Business	Insurance services
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u>Total</u>

2010 Survey Response: None

Available information: AIG Europe U.K. provides general insurance in Northern Ireland. The company has regularly responded to the Northern Ireland Service survey and provided copies of its EEO policy except in 2009, 2010 and 2011.

AIG Europe U.K. initially opened offices in Belfast in March 2004, estimating that it would ultimately employ about 150 people. A company representative explained, "the business area struggled to recruit the volume of staff it needed to sustain the business."

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations in Northern Ireland.

Underrepresentation analysis: AIG Europe U.K. neither appeared in the 2011 Register of employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 2008, the company told MSCI that it had signed an agreement with the MacBride proponents in 2004.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Anixter International Inc.

Operations in Northern Ireland:

Anixter Fasteners

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Anixter Fasteners

Location	Newtonabbey
Business	Distribution of communication and C-class components
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u>Total</u>

2010 Survey Response: None

Available information: Anixter Fasteners is a manager of supply chain services and a distributor of wire, cable, communications and physical security products.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Anixter Fasteners neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, it was unclear whether the company's employment policies were compliant with the MacBride Principles. The company had not responded to MSCI's Northern Ireland survey.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, it was unclear whether the Anixter employees faced security concerns in Northern Ireland.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Aon Corporation

Operations in Northern Ireland:

Aon McMillen

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	Yes		
Agreement Date	12/1/1991	Affirmative Action	No	FET Settlements	0

Aon McMillen

Location	Belfast
Business	Insurance broking/investment
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total 43

2010 Survey Response: None

Available information: Aon McMillen offers insurance broking and financial investment advice through its Belfast office. The company last responded to the Northern Ireland survey in 2009. In 2000, Aon McMillen provided a letter about its fair employment policies. Northern Ireland Service representatives met with Aon McMillen in 2005. The company's main source of revenue is insurance sales to commercial and corporate businesses; it also sells personal insurance.

Compliance with Northern Ireland fair employment law and Code of Practice: In October 2009, Aon McMillen told MSCI that it continued to adhere to all fair employment standards established by Northern Ireland laws. The company appeared to follow many recommendations of the Code. Aon said that it publicly advertised all openings and informed all employees about vacancies. It used the Belfast Telegraph, Irish News, local and regional newspapers and government job markets to advertise vacant positions. Aon always used interview panels with more than one interviewer, although both communities were not always represented on the panels. All employees involved in candidate selection have received training on equal employment issues; the company sometimes reviewed the religious composition of applicant pools. Senior managers in Northern Ireland were responsible for fair employment matters.

Underrepresentation analysis: As of February 2011, Catholics were underrepresented at Aon McMillen's operations in Northern Ireland. According to the 2010 Equality Commission's Monitoring Report, Aon McMillen had a total of 43 employees. However, no detailed breakdown was available. The report revealed that the company employed nine Catholics at most. If they were nine and the rest of the workforce were Protestants, Catholics would only account for 21 percent of the company workforce, making them underrepresented when compared to the Belfast total travel to work area (33 percent Catholic). This catchment area was chosen since the company was engaged in the insurance business which usually required high skilled workers who are most likely to come from areas within commuting distance of Belfast.

Conformance with MacBride principles: In October 2009, Aon McMillen told MSCI that its policies continued to reflect the MacBride Principles. Alexander & Alexander, a predecessor firm, reached an implementation agreement regarding the MacBride Principles in 1991.

Affirmative action outreach: In October 2009, Aon McMillen told MSCI that affirmative action measures were not needed at the company. It did not have an affirmative action agreement with the Equality Commission; it has set no goals and timetables regarding Catholic employees. Company representatives have never met with the Equality Commission or been asked to conduct affirmative action outreach. Given the low percentage of Catholic employees, the company may need to step up its recruitment efforts. The firm reported in its previous survey responses that it was finding it difficult to recruit qualified applicants.

Chill factor and neutral workplace: As of December 2011, the the company's office in Belfast posed no chill factor to either Catholics or Protestants.

Grievances: As of December 2011, no claims were filed against the company at the FET.

Aramark Corporation

Operations in Northern Ireland:

SMG (Northern Ireland) Ltd

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	8/1/2006	Affirmative Action	Unknown	FET Settlements	0

SMG (Northern Ireland) Ltd

Location	Belfast
Business	Operator of Arenas
Employees	(Data as of 2011)
	Protestant 49
	Catholic 29
	Other 20
	Total 98

2010 Survey Response: None

Available information: SMG operates the Odyssey Arena, a Landmark Millennium Project for Northern Ireland. The Arena, includes a cinema, a concert venue, the W5 discovery center, and a pavilion. SMG is a joint venture of Hyatt Hotels with Aramark, a hospitality and facility management company based in Pennsylvania. Aramark responded to the Northern Ireland Service from 2002 through 2005. The company responded again in 2009 but did not in 2010 and 2011.

Compliance with Northern Ireland fair employment law and Code of Practice: As of 2009, the company told MSCI that it adhered to all fair employment standards established by Northern Ireland law. Its first triennial policy review was completed in January 2004. The company also added that best practice procedures were applied as recommended by the Equality Commission and Northern Ireland HR consultants. The company recruited employees through public advertisements in the Belfast Telegraph, government job markets, and the Internet. In addition, Equal Employment

Opportunity (EEO) statements were included in its employment ads. Panel interview was used in interviewing job candidates. According to the company, the panel sometimes composed of representatives from both communities. In addition, all those involved in candidate selection received training on equal employment issues. The company also monitored the religious composition of the applicant pool and new hires to determine success rates by community. The company added that all employees received harassment training using materials from the Equality Commission. Senior managers at the company's operations in Northern Ireland were held responsible for implementing SMG's EEO policy. Employees at the company had no union representation.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at SMG's operations in Northern Ireland. According to the 2010 Equality Commission's Monitoring Report, SMG's workforce consisted of 49 Protestants (62.8 percent), and 29 Catholics (37.2 percent). The workforce composition is reflective of the religious representation in the Belfast's total travel-to-work area (67 percent Protestants, 33 percent Catholics) and the whole of Northern Ireland (57.3 percent Protestants, 42.7 percent Catholics). Given the company's nature of business, the weighted catchment area of all Northern Ireland and Belfast was deemed the most appropriate point of comparison.

Conformance with MacBride principles: As of 2009, the company told MSCI that it never received a shareholder resolution on the MacBride Principles, which was the usual route to an agreement. The company reported that its policies reflected the fair employment standards embodied in the MacBride Principles and it agreed to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company in the Fair Employment Tribunal (FET).

AVX Corporation

Operations in Northern Ireland:

AVX Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	Yes		
Agreement Date	2/1/1998	Affirmative Action	Yes	FET Settlements	0

AVX Ltd.

Location	Coleraine
Business	Multilayer ceramic capacitor manufacturing.
Employees	(Data as of 2011)
	Protestant 224
	Catholic 71
	Other 12
	<u>Total 307</u>

2010 Survey Response: None

Available information: The company has not responded to the Northern Ireland Service (NIS) survey since 2010. The NIS staff has interviewed local company officials in Northern Ireland three times, the most recent of which was in 2006. AVX also provided copies of its triennial review required under Northern Ireland's fair employment law.

AVX Ltd. is engaged in the manufacture of electronic components, particularly capacitors. Its work force has shrunk considerably from a high of 1,395 employees in 2001 to 307 as of February 2011. In April 2009, Belfast News cited a December 2008 article from the Belfast Telegraph stating that AVX would lay off 92 workers. Market conditions have been responsible for employment fluctuations at the company. As of March 2011, Kyocera Corp., a publicly traded Japanese company, owned 71.7 percent of AVX.

Compliance with Northern Ireland fair employment law and Code of Practice: In November 2009, AVX told MSCI that it still maintained an equal opportunities policy which conformed with Northern Ireland's fair employment laws. The policy called for periodic review of selection procedures, staff development, publicizing the policy and filing grievances. The responsibility for implementation of the policy was placed on managers, supervisors and other staff members who recruit and train employees, as well as those responsible for personnel matters. The Northern Ireland senior manager was responsible for overseeing fair employment matters at the company. The trade union was also consulted regarding EEO matters. The company has completed voluminous reports for its triennial reviews that it has submitted to the Equality Commission. Managers have attended equality management workshops. AVX has provided workshops and training for all employees to address potential sectarian harassment and intimidation in the workplace. Hiring procedures appeared to be systematic, as interview panels have representation from both communities; EEO training were provided for the staff involved in the process. Job advertisements were placed in local job markets, the company intranet and through recruitment agencies. AVX also tracked applicant success rates by religion to identify differential success rates. The company also disclosed that it has undertaken its training and employee development programs "without reference to employees' perceived religious beliefs."

Underrepresentation analysis: As of February 2011, Catholics were underrepresented at AVX Ltd. compared to the Northern Ireland catchment area (57.3 percent Protestant/42.7 percent Catholic). According to the 2010 Equality Commission Monitoring Report, AVX Ltd.'s workforce consisted of 71 Catholics (24.1 percent), and 224 Protestants (75.9 percent). The company is engaged in capacitor manufacturing. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, the entire province of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In November 2009, AVX told MSCI that its policies continued to be compliant with the MacBride Principles. The company added that it has coordinated

with the Equality Commission and has provided training to its employees to ensure compliance with the principles.

Affirmative action outreach: In November 2009, AVX told MSCI that the company included welcoming statements for underrepresented groups in its job advertisements.

Chill factor and neutral workplace: According to documents it provided to the Northern Ireland Service in 2006, AVX maintained that it has a neutral workplace; sectarian harassment and intimidation were prohibited and would be dealt with under the company's disciplinary procedures. AVX and its trade unions were also party to a Joint Declaration of Protection to ensure a neutral workplace free from harassment. All new employees were notified of the company's policy on harassment. The company added that the U.K.'s Engineering Employers Federation, a business organization, has provided AVX with materials and has coordinated with the company regarding workshops on harassment. The company also said that it continued to provide protection against victimization and retaliation directed at complainants. It also noted the company may dismiss employees who violate the policy. Employees were required to maintain strict confidentiality during any investigation of a harassment allegation. Following the resolution of a complaint, the policy provided for consideration of employee transfers so the employees involved in the incident need not continue working together.

As of November 2011, this was the most recent information available. The company had not provided any new information to MSCI since 2007.

Grievances: As of December 2011, no complaints have been filed against AVX at the Fair Employment Tribunal. In 2009 AVX told MSCI that it maintained a grievance policy which enables employees to file complaints confidentially or to someone other than their direct supervisor.

Baxter International Inc.

Operations in Northern Ireland:

Baxter Healthcare UK

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Baxter Healthcare UK

Location	Belfast
Business	Sales and distribution; kidney dialysis
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	Total

2010 Survey Response: None

Available information: Baxter International, which has a small office in Belfast, helped fund a new kidney failure treatment unit in Antrim Hospital in November 2000. Baxter sent letters in 2002,

2003, 2005 and 2008, disclosing the size of its workforce. However, the company never completed the Northern Ireland Service survey. Employment grew from 10 employees in 2003 to 15 in 2005, but has fallen in subsequent years to eight in 2008. Baxter's employees in Northern Ireland work at a sales and distribution center in Belfast and at a kidney dialysis center in partnership with the Antrim Hospital.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2008, the company told MSCI that it continued to be committed to treating all employees with dignity and respect. It also pledged its commitment to "fair opportunity for all employees" and to "unite a culturally diverse work force." The company added that it valued "the unique contributions of all individuals and recognized the diversity of its work force as a competitive advantage."

As of November 2011, this was the most recent information available.

Underrepresentation analysis: Baxter Healthcare UK neither appeared in the 2011 Register of employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of 2008, Baxter had not received a shareholder proposal to implement the MacBride Principles, the most common route to compliance. The company had not responded specifically to questions about adherence to the MacBride Principles, and it had not provided its work force composition that was expected of companies that are compliant with the principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Baxter Healthcare UK operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal. In 2008, the company provided copies of its global business practice standards manual, which included a section on workplace harassment and diversity. The manual advised that "any discrimination should be reported to the employee's supervisor, human resources representative, or any management employee," and stipulated that employees can bypass a supervisor suspected of discriminatory practices. In addition, employees can also contact a regional business practice committee member for help.

BE Aerospace, Inc.

Operations in Northern Ireland:

BE Aerospace (UK)

MacBride Agreement	No	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	No	FET Settlements	0

BE Aerospace (UK)

Location	Kilkeel, Co. Down
Business	manufacture of aircraft seats
Employees	(Data as of 2011)
	Protestant 262
	Catholic 268
	Other 21
	<u>Total 551</u>

2010 Survey Response: None

Available information: BE Aerospace has not responded to the Northern Ireland Service survey since 1993. In 1996, a company official said that a response to these inquiries would be "a waste of time and money." Some information has been available from proxy statement materials filed by BE Aerospace at the U.S. Securities and Exchange Commission in response to shareholder proposals.

Compliance with Northern Ireland fair employment law and Code of Practice: BE Aerospace reported in its previous U.S. SEC filings that continued to be an equal opportunity employer. Hiring procedures were based on the experience and qualifications needed to satisfy individual job requirements. Furthermore, the company noted that its policies for training, advancement, layoff and recall were fair. Sectarian emblems were not permitted in the workplace, and the company regularly provided security for all at work. The company met with representatives of the Equality Commission in 1998.

As of December 2011, this was the most recent company fair employment policy.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at BE Aerospace's operations in Northern Ireland. According to 2010 Equality Commission's Monitoring Report, BE Aerospace's workforce consisted of 262 Protestants (49.4 percent), and 268 Catholics (50.6 percent). The workforce composition is reflective of the religious representation of the whole of Northern Ireland (57.3 percent Protestants, 42.7 percent Catholics). The company is engaged in manufacturing aircraft seats. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, all of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: BE Aerospace has been at odds with the New York City Comptroller's office about the adoption of the MacBride Principles. BE Aerospace has said in its proxy statements that it already has taken the steps necessary to provide equal employment opportunity in Northern Ireland. It also has said that it has an established EEO program, and its subsidiary operation "essentially complies with the practices outlined in the MacBride Principles." However, the lack of more detailed information on its policies and practices makes it impossible to verify these statements. MacBride compliance includes cooperation with independent entities regarding monitoring of policies and employees. As of December 2011, BE Aerospace did not appear to have done this.

The company has urged shareholders to vote against proposals asking it to implement the MacBride Principles in every year between 1995 and 2002, except in 1997, when no proposal was submitted. Shareholder support for the proposal has varied. The proposal got a 31 percent support in 2001, 7.6 percent in 2002, 10.5 percent in 2006, and 12.6 percent in 2007.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, BE Aerospace employees did not appear to face chill factor concerns at work.

Grievances: As of December 2011, no complaints were filed against affiliate at the FET.

Caterpillar Inc.

Operations in Northern Ireland:

Wilson F.G. (Engineering)

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	Yes		
Agreement Date	2/1/2009	Affirmative Action	Yes	FET Settlements	0

Wilson F.G. (Engineering)

Location	Larne, Newtownabbey, Belfast
Business	Manufacture of diesel generators
Employees	(Data as of 2011)
	Protestant 1410
	Catholic 603
	Other 137
	Total 2150

2010 Survey Response: None

Available information: Caterpillar has consistently responded to the Northern Ireland Service survey except in 2010 and 2011. Wilson F.G. continues to be one of the largest publicly held U.S. employers in Northern Ireland. Wilson F.G. has several sites: a main manufacturing facility in Larne, two smaller facilities in West Belfast (Springvale) and Newtownabbey and an office in Belfast. Wilson F.G. provided the Northern Ireland Service with specific information on employees at each site in 2009. The company's expansion in Northern Ireland has been underwritten by government funding but has also involved substantial capital expenditures on the company's part.

Compliance with Northern Ireland fair employment law and Code of Practice: Wilson F.G.'s Equal Employment Opportunity policy had a comprehensive anti-discrimination statement. The company had consulted with employees and communicated its details to all workers to ensure the policy's effectiveness. The procedures described in the policy appeared to follow the requirements of Northern Ireland fair employment law and Code of Practice, and the recommendations of the Equality Commission.

In October 2009, Caterpillar told MSCI that that all Wilson F.G. employees were notified of positions open to internal applicants and that it often advertised permanent vacancies widely in Northern Ireland newspapers read by both communities, such as the Belfast Telegraph. The company also announced job openings on the Internet and radio. During the selection process, the company had always used an interview panel. However, the company did not ensure cross-community representation on the panels because the company considered it impracticable and inappropriate.

Wilson F.G. disclosed that it occasionally reviewed the religious composition of applicant and new hire pools to determine success rates by community as part of its annual and triennial submission

for the Equality Commission. This served as a useful check to ensure selection procedures were not biased.

Wilson F.G. had agreed to a redundancy procedure with its unions. The procedure provided for the application of measures that minimize impact on representation of any group and do not undermine affirmative action achievements of the company. The company's senior management based in Northern Ireland held direct responsibility for overseeing fair employment matters. In September 2001, the company recognized trade unions at its facilities after being a non-union shop for many years. Wilson F.G.'s managers had occasional discussions with employee representatives about equal opportunities.

Underrepresentation analysis: As of February 2011, Catholics were underrepresented at Wilson F.G. compared to the weighted catchment area of all Northern Ireland (42.7 percent Catholics). According to the Equality Commission's 2010 Monitoring Report, Wilson F.G.'s workforce consisted of 1,410 Protestants (70 percent), and 603 Catholics (30 percent). The company is engaged in the manufacture of diesel generators. Given the nature of the company's business, its employees most likely come from all over the province. As a result, all of Northern Ireland was deemed to be the most appropriate catchment area.

Conformance with MacBride principles: In October 2009, Wilson F.G. told MSCI that its policies continued to reflect the fair employment standards embodied in the MacBride Principles. In its July 2007 survey response, Wilson F.G. disclosed that it ensured that the standards embodied in the principles were implemented by local managers through the company's policies, procedures, and training. In 2002, Caterpillar reached an agreement on implementation of the MacBride Principles.

Affirmative action outreach: As of October 2009, Wilson F.G. told MSCI that the Equality Commission had not felt it necessary to set any affirmative action goals or timetables for the company, since it regularly carried out outreach programs in Protestant and Catholic communities to encourage more applicants and promote Wilson F.G. as an equal opportunities employer.

In its August 2008 survey response, Wilson F.G. told MSCI that it had an affirmative action agreement with the Equality Commission. The company placed an Equal Employment Opportunity statement in the company's job ads, and initiated outreach programs in specific schools as part of its affirmative action efforts to increase applicants from the underrepresented group.

Chill factor and neutral workplace: In August 2008, Wilson F.G. told MSCI that its employees may have faced a chill factor when traveling to and from work due to the location of the company's operations. The company disclosed that it has been trying to minimize this by ensuring a neutral working environment inside the company's premises. The company disclosed to have started a new workshop or training program related to anti-sectarianism. No sectarian or offensive materials were allowed to be displayed at the company. Wilson F.G. noted that it has disciplined and dismissed employees who have violated its neutral workplace policy. The company disclosed that it is closed for about five days around the time of the July marching season, as well as for several other holidays throughout the year. The regular summer sectarian unrest has had no direct impact on any of the company's operations in the last several years; any impact would be mitigated by its regular closure at the apex of tensions in early July.

The company's main facility is located in the outskirts of Larne, just off a major motorway, so employees do not need to travel through any Catholic or Protestant dominant areas to get to work. The West Belfast plant is located in the heart of heavily Catholic West Belfast. The location is considered intimidating to many Protestants and some Catholics from outside the area. The

Newtownabbey location is in a heavily Protestant district just north of Belfast that is in general intimidating to Catholics.

Wilson F.G.'s handbook stated that the company treats all forms of harassment, intimidation and victimization seriously. The harassment policy included protection from victimization or retaliation against complainants. The policy explicitly prohibited a variety of religious harassment and intimidation, in physical, verbal or nonverbal forms, and noted that such harassment includes conduct which creates an intimidating, hostile or humiliating working environment. Prohibited verbal harassment can include conversation about political incidents, shootings, bombings, parades or demonstrations, and the articulation (singing, whistling or humming) of party tunes. Complainants were directed by the company to report any problems to their supervisor or the next level of management. The complainants may be accompanied by another employee when interviewed by company officials. The company's policy also stated that all aspects of a complaint will be treated seriously, dealt with expeditiously and as far as possible, be treated in the strictest confidentiality.

Wilson F.G. has provided workshops and training on addressing sectarian harassment and intimidation for its managers and supervisors using materials from the Equality Commission and employers' associations. F.G. Wilson is a party to the Joint Declaration of Protection between the Engineering Employers' Federation and the Confederation of Shipbuilding and Engineering Unions, reached in 1989.

Northern Ireland's sectarian violence had at one point, directly affected the company and its workers. In November 2003, a 31-year-old welder employed by the company was killed in his home in Ballyclare by gunmen from the Ulster Volunteer Force, a Protestant paramilitary group. Local press reported that the victim had spoken out against loyalist paramilitaries and was killed in retaliation.

Grievances: As of December 2011, no complaints were filed against Wilson F.G. at the FET.

CBRE Group, Inc.

Operations in Northern Ireland:

CBRE Northern Ireland

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

CBRE Northern Ireland

Location	Belfast
Business	Commercial Property Consultants
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: As of December 2011, CB Richard Ellis Northern Ireland (CBRE NI) maintained an office in Belfast and continued to be engaged in the provision of commercial property consultancy. The company submitted a full response to the 2006 MSCI Northern Ireland Service survey and reported that it had 9 full time employees. The company had not responded since then.

Compliance with Northern Ireland fair employment law and Code of Practice: In its June 2006 survey response, CBRE NI disclosed that its operation is compliant with Northern Ireland's Fair Employment policies and practices.

Underrepresentation analysis: CBRE NI appeared in the 2011 Register of employers but was missing in the 2010 Monitoring Report, meaning that the company most likely had 11 to 25 employees.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In June 2006, CBRE NI told MSCI's Northern Ireland service that it was compliant with the MacBride Principles. However, as of December 2011, the company had not provided an update. As a result, the status of its MacBride compliance was unclear.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operation in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, CBRE NI operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no complaints were filed against CBRE NI at the FET.

CBS Corporation**Operations in Northern Ireland:**

CBS Outdoor Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	12/1/2006	Affirmative Action	Unknown	FET Settlements	0

CBS Outdoor Ltd.

Location	Belfast
Business	Advertising
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	Total

2010 Survey Response: None

Available information: CBS Outdoor Ltd. provides advertising services such as out-of-home media, including billboards, transit shelters, buses and rail systems. As of December 2011, ABC Outdoor, another Northern Ireland-based CBS subsidiary, was dormant. CBS last responded to the Northern Ireland Service's survey in 2009.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: CBS Outdoor Ltd. neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In July 2008, CBS told MSCI that it was taking all lawful measures in good faith to comply with the fair employment standards embodied in the MacBride Principles and the fair employment requirements of Northern Ireland.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, CBS operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Chevron Corporation

Operations in Northern Ireland:

Texaco

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Texaco

Location	Belfast terminal, 60 service stations
Business	marketing and distribution of petroleum products
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total 30

2010 Survey Response: None

Available information: In its previous survey response, Texaco reported that it had two employees at its directly owned subsidiary, Texaco Ltd., which was engaged in petroleum products marketing and distribution from a facility in the Belfast docks area. The company did not provide an updated staff count in its most recent correspondence with the Northern Ireland Service. There were 70 directly supplied Texaco retail service stations, most of which were run by independent dealers with fuel sales contracts. Texaco also supplied fuel to an additional 19 sites through an authorized dealer network. The company reported that many of the service stations in Northern Ireland were under sole proprietorship. Chevron added that it did not have records of how many people work at each site.

Compliance with Northern Ireland fair employment law and Code of Practice: The company disclosed that it held no responsibility for employment practices or requirements at the stations operated by independent agents as it did not own any of the properties or any part of the business. The independent operators were made responsible for employment practices and requirements. At the 19 sites in the authorized dealer network, each operator was made responsible for employment practices and requirements. The company also stated that its staff maintained high ethical standards with regard to employees. The company also expected its business partners to act in a responsible, ethical manner towards employees and to comply with all legal requirements.

Underrepresentation analysis: As of February 2011, the Protestant community continued to be underrepresented in Texaco when compared to the Belfast total travel-to-work-area (67 percent Protestants). According to the Equality Commission's 2010 Monitoring Report, the company had a total of 30 employees. However, no detailed breakdown was available. The monitoring also reported that the company employed fewer than ten Protestants. If they were nine Protestants and the rest of the workforce were Catholics, the Protestants would only account for 30 percent of the company workforce. Given the company's business, the Belfast travel-to-work-area was deemed the appropriate catchment area.

Conformance with MacBride principles: The company reached an agreement on MacBride compliance with investor advocates of the principles in 1991. The company stated that it observes the principles as appropriate and consistent with the legal framework.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the stations were located all around the province. Texaco did not disclose any sectarian problems at the company's operations in Northern Ireland.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Citigroup Inc.

Operations in Northern Ireland:

Citigroup

Citibank N.A.

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	8/1/2001	Affirmative Action	Unknown	FET Settlements	0

Citigroup

Location	Belfast
Business	financial services
Employees	(Data as of 2011)
	Protestant 279
	Catholic 356
	Other 136
	<u>Total 771</u>

2010 Survey Response: None

Available information: Citigroup first opened in in Belfast in 2004 and already employs more than 600 in the Northern Ireland's capital. In November 2010, Citigroup announced its intention to create 500 jobs in Northern Ireland over the following five years. Citigroup has given the Northern Ireland Service copies of its fair employment and harassment policies in 2001. The company did not respond to MSCI's Northern Ireland Survey in 2010 and 2011.

Compliance with Northern Ireland fair employment law and Code of Practice: Citigroup disclosed that it adhered to Northern Ireland fair employment law and followed the recommendations of the Code of Practice. Its EEO policy stated that the company will not discriminate in any aspect of employment and is committed beyond its statutory requirements to eliminate discrimination and disadvantages amongst its employees. Furthermore, the policy also required the employees' active participation to be effective. The policy provided detailed descriptions of what constitutes direct and indirect discrimination.

Citigroup continued to make use of job agencies to advertise vacancies, rather than placing recruitment ads directly itself. The company's legal department continued to review redundancies to determine their impact on equal opportunities issues before they are implemented. All employees received comparable training, which the company monitors. The district manager was made aware of all the responsibilities imposed by the company's EEO policies and was required to report up the chain of command. The company had no trade unions, and has not consulted with workers on fair employment matters, but has discussed its policies with the Equality Commission.

Underrepresentation analysis: As of December 2011, the Protestant community was underrepresented at Citigroup compared to all of Northern Ireland (57.3 percent Protestants). According to the Equality Commission's 2010 Monitoring Report, Citigroup employed 279 Protestants (43.9 percent) and 356 Catholics (56.1 percent). Since the company continued to be engaged in the provision of financial services, which is likely to attract employees from all over the province, then all of Northern Ireland was deemed the most appropriate catchment area.

Citigroup also reported data on hiring which was also reflective of the company's workforce breakdown.

Conformance with MacBride principles: Citigroup reached an agreement on the implementation of the MacBride Principles in 2001. The company stated that it ensures the principles are implemented by recording applicant data and making hiring decisions based on objective criteria.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Citigroup did not have sectarian problems at the company's operations in Northern Ireland. The company's location in Belfast is considered a neutral area for both communities.

Grievances: As of December 2011, no complaints were filed against Citigroup at the Fair Employment Tribunal.

Citibank N.A.

Location	Not disclosed
Business	Not disclosed
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Citibank N.A. is a wholly owned subsidiary of Citigroup Inc.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Citibank neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

The Northern Ireland Service refrains from drawing conclusions on community representation when the work force is not greater than 25 employees.

Conformance with MacBride principles: Citigroup reached an agreement on the implementation of the MacBride principles in 2001. The company stated that it ensures the principles are implemented by recording applicant data and that hiring decisions are based on objective criteria.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the location of Citibank's operations in Northern Ireland was not disclosed. As such MSCI was unable to assess whether any chill factor issues existed.

Grievances: As of December 2011, Citibank N.A. has one pending case with the FET.

Clear Channel Outdoor Holdings, Inc.

Operations in Northern Ireland:

Clear Channel NI Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	1/1/2006	Affirmative Action	Unknown	FET Settlements	0

Clear Channel NI Ltd.

Location	Belfast
Business	Advertising
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u>Total</u>

2010 Survey Response: None

Available information: Clear Channel Northern Ireland is engaged in advertising activities in its Belfast office. The company last responded to the Northern Ireland survey in 2008.

Compliance with Northern Ireland fair employment law and Code of Practice: As of July 2008, Clear Channel NI told MSCI that its Northern Ireland senior management continued to be responsible for overseeing the company's equality policy. The company disclosed that its policies and practices conform to Northern Ireland fair employment law and the Code of Practice. The company also disclosed that it had procedures in place for reporting grievances related to religious and political discrimination. These include filing a complaint confidentially or to someone other than the direct supervisor. The company's job ads were always advertised through the Belfast Telegraph, the company intranet, and recruitment agencies. The company's employees were always notified about positions open to internal applicants. However, it was not a common practice for the company to conduct a job interview with a panel of interviewers. The company also reported that the interviewers involved in the hiring process never had training in equal opportunity employment. However, the company continued to examine the religious composition of applicants and new hires to determine community success rates.

In its previous survey response, Clear Channel NI disclosed that it maintained handbook policies and employment contracts to ensure that its workplace remains free of sectarianism.

Underrepresentation analysis: Clear Channel (NI) appeared in the 2011 Register of Employers but was missing in the 2010 Monitoring Report, meaning that the company most likely had 11 to 25 employees.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of July 2008, Clear Channel NI told MSCI that its policies reflect the employment standards embodied in the MacBride Principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: In July 2008, the company reported that it had no issues related to chill factor. In its previous survey response, Clear Channel NI disclosed that it uses its company handbook policies and employment contracts to ensure its workplace remains free of sectarianism.

Grievances: As of December 2011, no complaints were filed against the company at the FET. In July 2008, Clear Channel NI disclosed in its survey response that it had procedures in place for reporting grievances related to religious and political discrimination. These include filing a complaint confidentially or to someone other than the direct supervisor.

ConocoPhillips

Operations in Northern Ireland:

ConocoPhillips Ltd.

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	12/1/1992	Affirmative Action	Unknown	FET Settlements	0

ConocoPhillips Ltd.

Location	Belfast
Business	Oil distribution
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: ConocoPhillips sells oil in Northern Ireland.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding ConocoPhillips' fair employment policies and practices.

Underrepresentation analysis: ConocoPhillips neither appeared in the 2011 Register of employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, there was no evidence to suggest that the company's policies were compliant with the Macbride Principles. The company had not responded to MSCI's Northern Ireland survey.

Affirmative action outreach: As of December 2011, it was unclear whether ConocoPhillips had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, ConocoPhillips employees faced no security concerns since the company's operations were located in Belfast, a neutral area.

Grievances: As of December 2011, no complaints were filed against ConocoPhillips at the FET.

Danaher Corporation

Operations in Northern Ireland:

Qualitrol Instruments

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	2/1/2003	Affirmative Action	No	FET Settlements	0

Qualitrol Instruments

Location	Belfast
Business	Power utility monitoring equipment
Employees	(Data as of 2011)
	Protestant 49
	Catholic 49
	Other 10
	Total 108

2010 Survey Response: None

Available information: In 2002, Danaher acquired the power and process segment of Hathaway Corp., which owned Hathaway Systems in Northern Ireland.

Compliance with Northern Ireland fair employment law and Code of Practice: In August 2008, Qualitrol Instruments told MSCI that its Northern Ireland senior management continued to be responsible for overseeing the company's equality policy. The company disclosed that it had procedures in place for reporting grievances related to religious and political discrimination. These include filing a complaint confidentially to someone other than the direct supervisor, or to an independent person of the same community background. Job openings in the company were always publicly advertised in the Belfast Telegraph and in job markets. Employees were always notified of positions open to internal applicants. As for the company's hiring procedures, the candidates were always interviewed by a panel with multiple interviewers. Occasionally, the panel of interviewers represented both communities in the company; they have undergone equal employment opportunity (EEO) training. The company also disclosed that it had never reviewed the religious composition of its applicants and new hires to determine community success rates.

In its previous survey response, Danaher disclosed that corporate standards of conduct applied to all its subsidiaries. Any breach of the EEO policy is considered a gross misconduct. The company stated that its operations adhere to Northern Ireland's fair employment law and Code of Practice. Selection for redundancy was based on an employee rating procedure involving performance, qualifications, ability, timekeeping, and responsibilities, and did not appear to be done on a last-in, first-out basis. Employees were selected for promotion based on merit, while training was provided to employees

on as needed basis. Danaher stated that management maintained close involvement in EEO concerns; monitoring reports were given monthly to senior management.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of December 2011, both communities were fairly represented at Qualitrol Instruments' operation in Northern Ireland. According to the Equality Commission's 2010 Monitoring Report, Qualitrol Instruments' workforce consisted of 49 Protestants (50 percent), and 49 Catholics (50 percent). The company is engaged in the manufacture of power utility monitoring equipment, which mostly requires high skilled workers from all over the province. As a result, all of Northern Ireland was deemed the most appropriate area of comparison.

Conformance with MacBride principles: In August 2008, Qualitrol Instruments told MSCI that its policies continued to reflect the fair employment standards embodied in the MacBride Principles.

In February 2003, the company reached an agreement on MacBride implementation, prompting the New York City pension funds to withdraw a shareholder resolution on the subject. The company stated that it ensures compliance with the principles through application of its EEO policy and corporate standards of conduct. Local management had been made aware of Danaher's intention to comply with the MacBride principles, as well.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

In August 2008, Qualitrol Instruments told MSCI that it does not have any requirement for affirmative action, since both communities were fairly represented in the breakdown of its workforce when compared to the catchment area in which the company operates.

Chill factor and neutral workplace: In August 2008, Qualitrol Instruments did not provide information regarding chill factor or security risk. However, in its June 2006 survey response, the company disclosed that it strictly enforces the terms of its fair employment and harassment policies, and anyone who violates these policies will be subject to disciplinary action under gross misconduct. The company also disclosed that workshops and training on anti-sectarianism and intimidation were made available for management, supervisors, and shop floor employees based on materials from the Equality Commission.

The company's facility is in an industrial area near West Belfast that appears to be accessible to both communities, although some Catholics may be somewhat intimidated by the neighborhood. The company stated that it has never found any need to offer specific assurances to minority employees at its workplace.

Grievances: As of December 2011, there was no active complaint against the company at the Fair Employment Tribunal.

The company's EEO policies prohibited unlawful discrimination and specifically encouraged employees to go to a higher level of management with concerns if necessary. Should such an incident occur, the employees involved will be suspended pending an investigation, statements from witnesses will be collected, and an appeals process will commence. The company also disclosed that it had procedures in place for reporting grievances related to religious and political discrimination. These include filing a complaint confidentially to someone other than the direct supervisor, or to an independent person of the same community background.

E. I. du Pont de Nemours and Company

Operations in Northern Ireland:

DuPont UK Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	3/1/1992	Affirmative Action	Unknown	FET Settlements	0

DuPont UK Ltd.

Location	Londonderry
Business	Kevlar manufacturing
Employees	(Data as of 2011)
	Protestant 59
	Catholic 110
	Other 0
	Total 169

2010 Survey Response: None

Available information: DuPont operates a kevlar production facility in Londonderry, Northern Ireland. Kevlar is a patented product and requires highly skilled workers with specialized training.

Compliance with Northern Ireland fair employment law and Code of Practice: In November 2009, DuPont told MSCI that the U.K. management was responsible for overseeing the company's equality policy. Job advertisements were placed in market-specific magazines, the Belfast Telegraph and the Derry Journal. Employees were also informed about the openings. A multiple member panel occasionally interviewed candidates. At times, the panels were composed of representatives from both communities.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at DuPont U.K. compared to the Northern Ireland catchment area (57.3 percent Protestant/42.7 percent Catholic). According to the 2010 Monitoring Report, DuPont UK's workforce consisted of 59 Protestants (34.9 percent), and 110 Catholic (65.1 percent). The company is engaged in kevlar manufacturing. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, the whole of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In November 2009, DuPont told MSCI that its policies were in accordance with the MacBride Principles. The company has provided training and workshops to ensure compliance. DuPont reached an accord with shareholder proponents of the MacBride Principles in 1992 and has cooperated with the monitoring process by the Northern Ireland Service (NIS). It met with the NIS staff in 2006.

Affirmative action outreach: As of December, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: In 2006, company representatives told the Northern Ireland Service staff that overtly sectarian problems have never occurred at the company. They attributed this cohesive working environment to generous salaries, which workers were unwilling to risk losing, and a strong presence of the parent company dating from the start of operations. DuPont's hands-on approach to the Northern Ireland operations helped disseminate the corporate policies against harassment.

As of December 2011, no further updates were provided by DuPont.

Grievances: As of December 2011, no complaints were filed against DuPont at the FET. In November 2009, DuPont told MSCI that it maintained a grievance policy that allowed employees to file complaints confidentially or with someone other than their immediate supervisor.

Eli Lilly and Company

Operations in Northern Ireland:

Eli Lilly & Co.

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Eli Lilly & Co.

Location	Sales people work from home
Business	Pharmaceutical product sales
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Eli Lilly and Company's (ELC) operation in Northern Ireland is part of Eli Lilly & Co. (Ireland) Ltd. Its sales representatives work from home.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2005, ELC told the Northern Ireland Service that its policies and practices followed the recommendations and requirements of the Code of Practice.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: ELC neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 2005, ELC told the Northern Ireland Service that its policies were not compliant with the MacBride Principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operation in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, ELC employees did not face security concerns as they worked from home.

Grievances: As of December 2011, No complaints were filed against ELC at the FET.

Emerson Electric Co.

Operations in Northern Ireland:

Copeland Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	9/1/1998	Affirmative Action	No	FET Settlements	0

Copeland Ltd.

Location	Cookstown, Co. Tyrone
Business	Compressors manufacturing
Employees	(Data as of 2011)
	Protestant 71
	Catholic 103
	Other 22
	<u>Total 196</u>

2010 Survey Response: None

Available information: Copeland commenced its production activities in Northern Ireland in April 1997.

Compliance with Northern Ireland fair employment law and Code of Practice: In August 2007, Copeland told MSCI that the company's Northern Ireland senior management was responsible for overseeing the company's equality policy. The company's employment practices continued to adhere to Northern Ireland fair employment law and the Code of Practice. Its EEO policy did not allow discrimination on a variety of grounds, including perceived religious belief or political opinion. The company's policy also stated that Copeland does not practice positive discrimination. Failure to comply with the policy could result in dismissal. Copeland posted its job advertisements in the Belfast Telegraph, local and regional newspapers, and in government job centers. It also included EEO statements in its ads. Interviews were always conducted by more than one person, and cross community representation was ensured where possible. The company's employees that were involved in candidate selection have received EEO training, and applicant success rates were tracked by religion. Copeland's EEO policy also called for record keeping at each stage of hiring and promotion, as stressed by the Equality Commission and Code of Practice. Its redundancy policy strongly discouraged discrimination. An appeals procedure was set up for complainants.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Copeland's operations in Northern Ireland. According to the Equality Commission's 2010 Monitoring Report, Copeland's workforce consisted of 71 Protestants (40.8 percent), and 103 Catholics (59.2 percent). The company is engaged in the manufacture of compressors, which mostly require lesser skilled workers who are likely to come from nearby areas. As a result, the Cookstown travel to work area (45 percent Protestant) was deemed the most appropriate catchment area for comparison.

Conformance with MacBride principles: As of August 2007, Copeland told MSCI that its policies reflect the employment standards embodied in the MacBride Principles. The company ensured that the standards embodied in the principles were implemented through its recruitment and selection policy. In September 1998, Emerson reached an understanding with MacBride advocates on implementation of the principles. Corporate officials from Emerson have also disclosed that they believe the company was doing the right thing in Northern Ireland by providing jobs and employment opportunities in disadvantaged areas.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: In 2007, the company told MSCI that its EEO policy prohibited the display of flags, emblems, posters, and graffiti, or the circulation of materials, or the deliberate articulation of slogans or songs, which were likely to give offense to or cause apprehension among particular groups of existing or potential employees. Copeland maintained a policy that described in detail what constitutes inappropriate behavior, with specific examples, covering sexual, racial, as well as religious and political harassment. The grievance procedure for this policy was similar to the equal opportunities grievance procedure. It also included additional provisions for the transfer of affected employees so they need not continue to work together, regardless of the outcome of the investigation.

The company also stated that it did not take any particular steps to ensure workplace security or safety for workers coming to and from the plant. This may not be needed, given the area where Copeland is located. The company stated that its location would not pose a chill factor to either Catholics or Protestants. Although Copeland recognized no trade unions, the company said that it supported a Joint Declaration of Protection for employees regarding sectarian harassment.

Grievances: As of December 2011, no complaints were filed against Copeland at the FET.

General Electric Company

Operations in Northern Ireland:

GE Medical Systems

GE Capital Woodchester (NI)

Note: As of December 2011, GE no longer had a stake in Charles Hurst.

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	9/1/1998	Affirmative Action	Unknown	FET Settlements	0

GE Medical Systems

Location	Belfast
Business	sales/service of medical equipment
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: GE Medical Systems has a small operation in Belfast. The company sells medical systems. In 2006, GE provided a copy of the company's monitoring report that it submitted to the Equality Commission.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2006, GE Medical Systems told MSCI that the company's policies adhere to fair employment law in Northern Ireland. The company stated that all job openings were publicly advertised in the Belfast Telegraph. The company regularly notified all employees about positions open to internal applicants. Employees who were involved in candidate selection have received EEO training and interview panels were always represented by both communities. It occasionally reviewed the religious composition of its applicants and new hires to determine success rates by community. The company also noted that management has received training on sectarian harassment using materials from the Equality Commission.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: GE Medical Systems appeared in the 2011 Register of Employers but was missing in the 2010 Monitoring Report, meaning that the company most likely had between 11 and 25 employees. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: GE reached an agreement in 1998 about the implementation of the MacBride Principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, no chill factor existed for workers of either community.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal.

GE Capital Woodchester (NI)

Location	Belfast
Business	Auto leasing
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: GE Capital provides auto leasing services in Northern Ireland.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2004, GE told MSCI that Woodchester's policies adhered to fair employment law in Northern Ireland. All managers were fully briefed on policies and procedures of equal opportunity and sectarian harassment. Managers in Northern Ireland were responsible for "developing and promoting a fair place of work" while senior management in the Dublin head office had oversight and "ensure objectivity in recruitment and grievance handling."

GE told MSCI that it maintained a policy on sectarian harassment which it had circulated to all employees. The general manager was responsible for all grievances raised through the formal complaints procedure. Employees who believe they have been inequitably treated may raise grievances at the senior management level or directly to the human resources department.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: GE Capital Woodchester neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: GE reached an agreement in 1998 about the implementation of the MacBride Principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, no chill factor existed for the company's employees.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal.

Henry Schein, Inc.

Operations in Northern Ireland:

Henry Schein K.M. Ltd.

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Henry Schein K.M. Ltd.

Location	Belfast
Business	Dental supplies
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total

2010 Survey Response: None

Available information: Henry Schein K.M. provides medical, dental, and veterinary health care products and services.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Henry Schein K.M. appeared in the 2011 Register of Employers but was missing in the 2010 Monitoring Report, meaning that the company most likely had 11 to 25 employees.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, there was no evidence to suggest that the company's policies were compliant with the MacBride Principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Henry Schein employees faced no chill factor as the company operated in Belfast, a neutral area.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Hewlett-Packard Company

Operations in Northern Ireland:*Hewlett-Packard*

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Yes	FET Settlements	0

Hewlett-Packard

Location	Belfast
Business	Computer sales, consultancy and service
Employees	(Data as of 2011)
	Protestant 22
	Catholic 25
	Other 34
	<hr/> Total 81

2010 Survey Response: None

Available information: Before its April 2002 merger with Hewlett-Packard, Compaq Computer regularly responded to the Northern Ireland survey. Compaq Computer provided annual survey responses and arranged on-site interviews with local managers, the most recent of which was in 1999. According to the 2010 Equality Commission's Monitoring Report, issued in December 2011, employment at the company's Belfast operations was at 81 workers, up from 41 compared to the previous monitoring period.

Hewlett-Packard joined Microsoft and other companies to create the School Technology Innovation Centers (STICs) in Belfast (with a sister school in Prague, Czech Republic), intended to help educators grasp new technologies and create innovative teaching tools.

Compliance with Northern Ireland fair employment law and Code of Practice: In July 2008, Hewlett-Packard's recruitment procedures followed the guidelines of the Code of Practice. The company advertised available jobs on the Internet and included an Equal Employment Opportunity (EEO) statement in its ads. All employees involved in the candidate selection received proper EEO training. The company also screened job candidates by panel interview. A review of the religious composition of the applicants and new hires were conducted to determine success rates by community. In addition, employees were notified of available positions in the company. Senior management in Northern Ireland and the U.K. were held responsible for implementing the company's equality policy.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at Hewlett-Packard compared to the whole of Northern Ireland (57.6 percent Protestant and 42.3 percent Catholic). According to the Equality Commission's 2010 Monitoring Report, Hewlett-Packard's workforce consisted of 22 Protestants (46.8 percent) and 25 Catholics (53.2 percent). The company is engaged in computer sales and IT related technical consultation. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, the whole of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In July 2008, Hewlett-Packard told MSCI that it continued to honor the MacBride Principles commitments made by its predecessor companies. Digital Equipment, a predecessor firm to Compaq, reached an agreement with shareholders on MacBride implementation in 1989. Compaq honored this agreement and said in 1999 that it "has in practice been taking lawful steps to implement the fair employment standards embodied in the MacBride Principles" and "expects to continue to cooperate" with monitoring by the Northern Ireland Service.

Affirmative action outreach: In July 2008, Hewlett-Packard told MSCI that its EEO policy was committed to take "positive action" for groups "that have been traditionally disadvantaged" and were underrepresented in hiring or promotion over a 12-month period.

Chill factor and neutral workplace: As of December 2011, Hewlett-Packard was located in Belfast, a neutral and accessible location for both communities. In July 2008, the company told MSCI that there has been no sectarian incidents at the company. In addition, the company stated that in any case of harassment, local managers should be alerted and that reports should be made to local government officials.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal (FET). As of July 2008, the company had a grievance policy that allowed employees to file complaints confidentially and to someone other than their immediate supervisor.

Honeywell International Inc.

Operations in Northern Ireland:

Honeywell Process Solutions

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	12/1/1990	Affirmative Action	Unknown	FET Settlements	0

Honeywell Process Solutions

Location	Belfast
Business	Customer Assistance
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: The company last responded to the survey in 2002 when it reported a Belfast work force of six employees, the same size it had been in 2000.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations in Northern Ireland.

Underrepresentation analysis: Honeywell Process Solutions neither appeared in the 2011 Register of employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

Conformance with MacBride principles: In 2002, Honeywell told MSCI that the company had signed an agreement for the implementation of the MacBride Principles in 1990.

Affirmative action outreach: As of December 2011, no information was available as to whether the company has undertaken any affirmative action steps at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland that did not pose a chill factor to either community.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Hyatt Hotels Corporation

Operations in Northern Ireland:

SMG (Northern Ireland) Ltd

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	No	FET Settlements	0

SMG (Northern Ireland) Ltd

Location	Belfast
Business	Operator of Arenas
Employees	(Data as of 2011)
	Protestant 49
	Catholic 29
	Other 20
	Total 98

2010 Survey Response: None

Available information: SMG operates the Odyssey Arena, a Landmark Millennium Project for Northern Ireland. The Arena, includes a cinema, a concert venue, the W5 discovery center, and a pavilion. SMG is a joint venture of Hyatt Hotels with Aramark, a hospitality and facility management company based in Pennsylvania. Aramark responded to the Northern Ireland Service from 2002 through 2005. The company responded again in 2009 but did not in 2010 and 2011.

Compliance with Northern Ireland fair employment law and Code of Practice: As of 2009, the company told MSCI that it adhered to all fair employment standards established by Northern Ireland law. Its first triennial policy review was completed in January 2004. The company also added that best practice procedures were applied as recommended by the Equality Commission and Northern Ireland HR consultants. The company recruited employees through public advertisements in the Belfast Telegraph, government job markets, and the Internet. In addition, Equal Employment Opportunity (EEO) statements were included in its employment ads. Panel interview was used in interviewing job candidates. According to the company, the panel sometimes composed of representatives from both communities. In addition, all those involved in candidate selection received training on equal employment issues. The company also monitored the religious composition of the applicant pool and new hires to determine success rates by community. The company added that all employees received harassment training using materials from the Equality Commission. Senior managers at the company's operations in Northern Ireland were held responsible for implementing SMG's EEO policy. Employees at the company had no union representation.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at SMG's operations in Northern Ireland. According to the 2010 Equality Commission's Monitoring

Report, SMG's workforce consisted of 49 Protestants (62.8 percent), and 29 Catholics (37.2 percent). The workforce composition is reflective of the religious representation in the Belfast's total travel-to-work area (67 percent Protestants, 33 percent Catholics) and the whole of Northern Ireland (57.3 percent Protestants, 42.7 percent Catholics). Given the company's nature of business, the weighted catchment area of all Northern Ireland and Belfast was deemed the most appropriate point of comparison.

Conformance with MacBride principles: As of 2009, the company told MSCI that it never received a shareholder resolution on the MacBride Principles, which was the usual route to an agreement. The company reported that its policies reflected the fair employment standards embodied in the MacBride Principles and it agreed to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company in the Fair Employment Tribunal (FET).

International Business Machines Corporation

Operations in Northern Ireland:

IBM (UK) Ltd

MacBride Agreement	Unknown	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

IBM (UK) Ltd

Location	Belfast
Business	computer sales and service
Employees	(Data as of 2011)
	Protestant 13
	Catholic 11
	Other 3
	<u>Total 27</u>

2010 Survey Response: None

Available information: IBM provided a partial response to the Northern Ireland Service's fair employment survey in 2008.

Compliance with Northern Ireland fair employment law and Code of Practice: As of 2008, IBM's policies appeared to adhere to the fair employment laws in Northern Ireland. As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at IBM compared to the Belfast total travel to work area (67 percent Protestants). According to the Equality Commission's 2010 Monitoring Report, IBM's workforce consisted of 13 Protestants (54.2 percent) and 11 Catholics (45.8 percent). The company is engaged in computer sales and services. This activity requires low skilled employees, who are most likely to come from nearby areas. As a result, the Belfast total travel to work area was deemed the most appropriate point of comparison.

Conformance with MacBride principles: In July 2008, IBM told MSCI that it was uncertain if the company's policies reflected the fair employment standards embodied in the MacBride Principles.

IBM and MacBride shareholder proponents reached an agreement in 1992. The company stated that it would make lawful efforts to implement the principles to the extent they are applicable. As of December 2011, the status of this agreement was unclear.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, IBM's office was located in a neutral area that did not pose a chill factor to either community. The company had informal and formal grievance policies in place. The company's informal grievance policy permitted an employee to bring an unresolved matter to the attention of human resources, which may assign an independent investigator. The company also had a 'Speak Up' program that allows employees to raise concerns without revealing their identity to anyone but the 'Speak Up' coordinator.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Jacobs Engineering Group Inc.

Operations in Northern Ireland:

Jacobs Engineering UK Limited

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Jacobs Engineering UK Limited

Location	Belfast
Business	Civil consulting
Employees	(Data as of 2011)
	Protestant 17
	Catholic 21
	Other 3
	Total 41

2010 Survey Response: None

Available information: Jacobs Engineering Group offers consulting services to industrial, commercial and government clients worldwide. The company's subsidiary, Jacobs UK, began

operating in Northern Ireland in the late 1990s. It won a contract from the Northern Ireland Department for Regional Development Water Service in May 2006. The company supported a USD380 million annual capital investment program. The Northern Ireland Service surveyed the company for the first time in 2006 and it responded in full, but the company had not responded since 2007.

Compliance with Northern Ireland fair employment law and Code of Practice: In May 2007, the company told MSCI that its policies adhered to the Code of Practice. Jacobs Engineering notified all employees when positions become available to internal applicants. Advertisements were also published in variety of sources, including the Belfast Telegraph, other local newspapers, job markets, trade publication, and the company intranet. The company disclosed that it did not always conduct panel interview when selecting candidates, but all employees involved in candidate selection were trained on equal opportunity employment issues. In addition, management occasionally consulted with trade unions on equality policy issues. Corporate headquarters and the U.K. management were held responsible for overseeing the company's equality policy in the province. All managers received training on sectarianism and intimidation issues.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at Jacobs Engineering UK compared to the whole of Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, Jacobs Engineering UK's workforce consisted of 17 Protestants employees (45 percent), and 21 Catholics (55 percent). The company is engaged in providing consulting services to industrial, commercial and government clients. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, the entire province of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of May 2007, Jacob Engineering agreed to cooperate with the Northern Ireland Service and reported that its policies adhered to the MacBride Principles. The company also disclosed that senior management reviewed local managers to ensure that the standards embodied in the MacBride Principles were maintained.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company was located in Belfast, a neutral area that did not pose chill factor to both communities. In May 2007, Jacobs Engineering told MSCI that it provided a neutral workplace for its employees. The company added that its location was selected from both a religious perspective and staff safety to/from work.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal. In May 2007, Jacobs Engineering told MSCI that its employees were allowed to raise complaints confidentially or speak with someone other than their direct supervisor.

Johnson & Johnson

Operations in Northern Ireland:

Johnson & Johnson

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Johnson & Johnson

Location

Business

Employees

Pharmaceutical sales

(Data as of 2011)

Protestant

Catholic

Other

Total

2010 Survey Response: None

Available information: In its 2009 survey response, Johnson & Johnson told MSCI that it still had some employees in Northern Ireland. The company said other survey questions were not applicable to its operations because it had no companies or plants based in Northern Ireland.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Johnson & Johnson neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, it was unclear whether the company's employment policies were compliant with the MacBride Principles. The company had not responded to MSCI's Northern Ireland survey.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, it was unclear whether company employees faced chill factor or security concerns in Northern Ireland.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Kellogg Company

Operations in Northern Ireland:

Kellogg Company of Great Britain

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Kellogg Company of Great Britain

Location	Sales employees work from home
Business	Breakfast cereals sales
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u>Total</u>

2010 Survey Response: None

Available information: In 2008, Kellogg told MSCI it had four home-based employees in Northern Ireland. The employees sold breakfast cereals.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations in Northern Ireland.

Underrepresentation analysis: Kellogg neither appeared in the 2011 Register of employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 2006, the company told MSCI that it has "not endorsed the MacBride Principles, but [is] a reasonable employer in all respects". In 2008, the company added it "operates to the highest international standards and does not discriminate on any basis."

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Kellogg's employees did not face security concerns since they worked from home.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal (FET).

Kraft Foods Inc.
Operations in Northern Ireland:
Kraft Foods (UK) Ltd.

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	12/1/1995	Affirmative Action	Unknown	FET Settlements	0

Kraft Foods (UK) Ltd.

Location	Employees work from home
Business	Food product sales
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u>Total</u>

2010 Survey Response: None

Available information: Kraft Foods UK imports and sells products made at other European locations. Kraft's employees works from home. The company previously reported that it employed four sales people (two Protestants and two Catholics) in Northern Ireland.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2007, Altria told MSCI that it complied with Northern Ireland's fair employment law. In 1998, it transferred responsibility of the company's Northern Ireland operations from its Dublin office to a Cheltenham in England, office in 1998. The company maintained no formal records of its employees' religion but has deduced the monitoring information from employee addresses.

Underrepresentation analysis: Kraft Foods neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 1995, the company reached an agreement in the MacBride proponents.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011 Kraft employees did not face chill factor as they all worked from home.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Manpower Inc.

Operations in Northern Ireland:

*Right Management**Manpower (UK) Ltd*

MacBride Agreement	No	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Right Management

Location	Belfast
Business	Management consulting
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	Total

2010 Survey Response: None**Available information:** Right Management has a small office at Clarendon Docks in Belfast.**Compliance with Northern Ireland fair employment law and Code of Practice:** As of December 2011, no information was available regarding the company's fair employment policy policies and practices.**Underrepresentation analysis:** Right Management neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: The company has not provided any information on its policies regarding MacBride compliance and it has not responded to the Northern Ireland Service survey. In response to a shareholder resolution in 2008 and 2007, the company said that while it supports the intent of the MacBride Principles, subscribing to them would be burdensome and a duplication of company policies. The resolution got 13.2 percent support in 2008 and 13.8 percent in 2007.**Affirmative action outreach:** As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.**Chill factor and neutral workplace:** As of December 2011, the company operated in Belfast, a neutral area that posed no chill factor or security concerns to either Protestants or Catholics.**Grievances:** As of December 2011, no complaints were filed against the company at the FET.

Manpower (UK) Ltd

Location	Belfast
Business	Recruitment staffing solutions
Employees	(Data as of 2011)
	Protestant 55
	Catholic 116
	Other 9
	<u>Total 180</u>

2010 Survey Response: None

Available information: Manpower is an employment services company. The company has not responded to the Northern Ireland Service survey for several years, and management has opposed shareholder resolutions asking the company to adopt the MacBride Principles.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at MUK compared to the Northern Ireland catchment area (57.3 percent Protestant and 42.7 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, MUK's workforce consisted of 55 Protestants (32.2 percent), and 116 Catholics (67.8 percent). The company is engaged in recruitment staffing services. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, all of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: The company has not provided any information on its policies regarding MacBride compliance and it has not responded to the Northern Ireland Service survey. In response to a shareholder resolution in 2008 and 2007, the company said that while it supports the intent of the MacBride Principles, subscribing to them would be burdensome and a duplication of company policies. The resolution got 13.2 percent support in 2008 and 13.8 percent in 2007.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Manpower UK faced no chill factor as the company operated in Belfast, a neutral area.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Marsh & McLennan Companies, Inc.

Operations in Northern Ireland:

*Mercer Human Resources Consulting**Marsh (UK), Ulster Insurance Services, Marsh Finan*

MacBride Agreement	Unknown	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	Yes		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Mercer Human Resources Consulting

Location	Belfast
Business	Pensions consultancy/administration
Employees	(Data as of 2011)
	Protestant 37
	Catholic 26
	Other 18
	Total 81

2010 Survey Response: None

Available information: Mercer Human Resources, a pension consultancy company, last responded to the Northern Ireland Service survey in 2003.

Compliance with Northern Ireland fair employment law and Code of Practice: As of 2003, the company told MSCI that Mercer followed the recommendations as well as the legal requirements of the Code of Practice and that it adhered to the standards established by the Fair Employment and Treatment (Northern Ireland) Order 1998. The company advertised job openings on the Internet and in trade publications. MacBride proponents advocate advertising in all three Belfast dailies. The company conducted panel interviews but it never ensured that both communities were represented on the panel. Those involved in candidate selection have undergone training. The company reviewed the religious composition of applicant pools and new hires.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Mercer's operations in Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic). According to the 2010 Equality Commission's 2010 Monitoring Report, Mercer's workforce consisted of 37 Protestants (58.7 percent), and 26 Catholics (41.3 percent). The workforce composition is reflective of the religious representation in the whole of Northern Ireland. The company is engaged in pension consultancy. This mostly requires high skilled workers, who are most likely to come all over the province. As a result, all of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of 2003, the company told MSCI that Mercer Human Resource Consulting recognized the commitments made by Marsh & McLennan when it reached agreement on implementation of the MacBride Principles with shareholder activists in 1994. However, the company has not provided an update regarding its MacBride compliance status since then. As a result, MacBride status was changed from compliant to unknown.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company's location in central Belfast should not pose a chill factor for either Catholics or Protestants.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Marsh (UK), Ulster Insurance Services, Marsh Finan

Location	Belfast and Strabane
Business	Insurance services
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total 36

2010 Survey Response: None

Available information: Marsh & McLennan, an insurance brokerage firm, last responded to the Northern Ireland Service survey in 2003.

Compliance with Northern Ireland fair employment law and Code of Practice: As of 2003, the company told MSCI that it followed the Code of Practice and the Northern Ireland fair employment law. The company added that fair employment issues were discussed at regular staff association meetings and that religious harassment was on the agenda at all Belfast executive meetings. The company included an equal employment opportunity statement in its advertisements. Advertisements were featured only in the Belfast Telegraph and government job markets. In addition, the company conducted panel interviews with representatives from both sides of the community and tracked applicant success rates by religion. Company representatives involved in candidate selection have received training on equal employment issues. Marsh & McLennan used materials from the Equality Commission to provide training and workshops on workplace harassment and intimidation to all employees, with separate training for managers. The company also worked with the Irish Congress of Trade Union's Counteract project to address potential sectarian harassment and intimidation.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, Catholics were underrepresented at Marsh UK compared to the whole of Northern Ireland area (57.3 percent Protestant and 42.7 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, Marsh's workforce consisted of less than 10 Catholics. If they were nine and the rest of the workforce were Protestants, Catholics would account for 25 percent of the company workforce. The company is engaged in insurance brokerage. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In 2003, the company told MSCI the company and shareholder activists reached an agreement on implementation of the MacBride Principles in 1994.

However, the company has not provided an update regarding its MacBride compliance status since then. As a result, the MacBride status was changed from compliant to unknown.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company's location in central Belfast should not pose a chill factor for either Catholics or Protestants. The other site outside of Derry city is in a predominately Protestant neighborhood and could be off-putting towards Catholics.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal (FET).

McDonalds Corporation

Operations in Northern Ireland:

JMC Restaurants t/a McDonald's Sprucefield

Rahon Enterprises t/a McDonald's

McDonald's Restaurants

Dunluce Restaurants t/a McDonald's

Cobain Mark t/a McDonald's Glengormley

Hewitt Geoff t/a McDonald's Ballymena

McDermott Paul t/a McDonald's Connswater

S & S Restaurants t/a McDonald's Restaurant

Connan Paul Ltd.

North West Restaurants Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

JMC Restaurants t/a McDonald's Sprucefield

Location	Lisburn
Business	fast food
Employees	(Data as of 2011)
	Protestant 42
	Catholic 32
	Other 8
	Total 82

2010 Survey Response: None

Available information: See McDonald's Restaurants for more information on this franchise.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at JMC Restaurants compared to the Lisburn catchment area (68.5 percent Protestant and 31.5 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, JMC Restaurant's workforce consisted of 42 Protestants (56.8 percent), and 32 Catholics (43.2 percent). The company is engaged in the fast food business. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, Lisburn was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of December 2011, no information was available as to whether the company embodies the MacBride Principles at its operations in Northern Ireland.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place.

Chill factor and neutral workplace: As of December 2011, the company operated in Lisburn, a Protestant dominant location, which may raised concern in some of the Catholic employees.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal.

Rahon Enterprises t/a McDonald's

Location	Bangor
Business	fast food
Employees	(Data as of 2011)
	Protestant 296
	Catholic 265
	Other 8
	<hr/>
	Total 556

2010 Survey Response: None

Available information: See McDonald's Restaurants for more information on this franchise.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at Rahon Enterprises compared to the North Down catchment area (85.3 percent Protestant and 14.7 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, Rahon Enterprises' workforce consisted of 114 Protestant (52.8 percent), and 102 Catholic (47.2 percent). The company is engaged in the fast food business. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, North Down is deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of December 2011, no information was available as to whether the company embodies the MacBride principles at its operations in Northern Ireland.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Down, a Catholic dominant location, which may raised some concern in some of the Protestant employees.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

McDonald's Restaurants

Location	24 locations province-wide	
Business	fast food	
Employees	(Data as of 2011)	
	Protestant	20
	Catholic	86
	Other	3
	Total	109

2010 Survey Response: None

Available information: McDonalds has several franchise operations with a combined 26 restaurants in Northern Ireland. Ten restaurants are owned and operated by the company through its subsidiary, McDonald's Restaurants Ltd., in Portadown, Lurgan, Downpatrick, Belfast (two locations), Craigavon, Enniskillen, Cookstown, Omagh and Dungannon. The other nine franchise holders in Northern Ireland are: JMC Restaurants Ltd. in Lisburn, North West Restaurants Ltd. in Londonderry (three restaurants), Dunluce Restaurants Ltd. in Coleraine, Mark Cobain in Newtownabbey and Glengormley, Paul McDermott in Belfast, Geoff Hewitt in Ballymena and Carrickfergus, Keith Inskip in Douglas, Rahon Enterprises in Bangor and Belfast, S & S Restaurants Ltd. in Newry, and Paul Connan Ltd. in Dundonald and Belfast.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2009, the company told MSCI that McDonald's Restaurants followed Northern Ireland law concerning the recruitment, interviewing, and hiring process. The company used an independent outside consultant to compile information with respect to religion (and gender) regarding applications and employees hired in its restaurants and the consultant provided this information to the Equality Commission. In addition, McDonald's franchise holders provided this information to the Equality Commission separately. In addition, the company's franchisees also operated under agreements that require them "to comply with local laws."

McDonalds disclosed that it advertised all openings publicly, and notified all employees of positions open to internal applicants. It advertised openings in local and regional newspapers, government job markets, and the Internet. The company used job markets in particular areas when it conducted affirmative action, and also conducted what it dubbed "communications sessions" with restaurant staff on this subject. McDonald's did not use panels with more than one person to interview job candidates but all staff involved in candidate selection received EEO training. The company also reviewed the religious composition of applicant pools and new hires to determine community success rates, which can be an important check to ensure no bias had crept into the selection process. The company said all promotions were based on merit; training was non-discriminatory. The company's UK diversity policy specifically stated that in Northern Ireland, it will "aim to make sure that no job applicant or existing employee was treated less favorably on the grounds of their political opinions," and that discrimination on setting standards [that] some employees were less likely to be able to achieve because of their political opinions" constituted indirect discrimination.

Managers were held directly responsible for adherence to the diversity policy. The company said that managers must "challenge questionable behavior and practices" and manage "their teams to create work environments where all employees are valued." Senior management at the company had overall responsibility for enforcing the company's diversity policy. Meanwhile the human resources department regularly monitored and reviewed the policy to determine the need for additional action to ensure compliance. The policy was last updated in December 2003.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at McDonalds Restaurants compared to the whole of Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, McDonalds Restaurant's workforce consisted of 20 Protestants (18.9 percent), and 86 Catholics (81.1 percent). The company is engaged in the fast food business. Considering the number of its store locations, all of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of 2009, the company told MSCI that its policies reflect the fair employment policies embodied in the MacBride Principles and that it will respond in full to the Northern Ireland Service fair employment survey. McDonald's Restaurants distributed its diversity policy to all franchisees in Northern Ireland, and said that it encouraged the franchisees "to adopt such a policy as their own for their restaurants." However, it was unclear how policy was enforced at the franchise restaurants or how many franchisees had adopted it. McDonald's Restaurants conducted an annual business review of each franchise restaurant to determine "expandability of each franchise holder," and as part of this assessment, an in-depth examination of various people practices was conducted, including the diversity policy and a determination as to whether the franchise holder has had any serious employment relations issues in the past year.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: In 2009, the company told MSCI that it was not aware of any specific sectarian problems at any of the company's Northern Ireland locations. Employees working late night hours in the company's restaurants may be particularly vulnerable to localized incidents of sectarianism from customers, given their relative isolation. There had been a handful of robberies or attempted robberies at various McDonald's operations in Northern Ireland in the last few years in its restaurants in and near Belfast, including a murder in a central Belfast franchise in 2001, but all appeared to be what police in Northern Ireland called "ordinary decent crimes" that were unrelated to the "troubles."

McDonald's said it held communication sessions with employees at all levels in the organization to highlight and address any potential issues or problems they may face whilst working or traveling to and from their place of work. Additionally, taxis were provided for staff at potentially sensitive times, and restaurants had been closed temporarily as protection. The company provided cars to restaurants managers and senior staff above that level. The company's diversity policy specifically forbid sectarian harassment of staff, and all employees received workshops or training on sectarian harassment and intimidation using materials from the Equality Commission and other sources.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Dunluce Restaurants t/a McDonalds

Location	Coleraine
Business	fast food
Employees	(Data as of 2011)
	Protestant 63
	Catholic 23
	Other 9
	<hr/> Total 95

2010 Survey Response: None**Available information:** See McDonald's Restaurants for more information on this franchise.**Compliance with Northern Ireland fair employment law and Code of Practice:** As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.**Underrepresentation analysis:** As of February 2011, both communities were fairly represented at Dunluce Restaurant's operations in Northern Ireland. According to the 2010 Equality Commission's Monitoring Report, Dunluce Restaurant's workforce consisted of 63 Protestants (73.3 percent), and 23 Catholics (26.7 percent). The workforce composition is reflective of the religious representation in Coleraine (71.9 percent Protestant and 28.1 percent Catholics). The company is engaged in the fast food business. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, Coleraine was deemed the most appropriate catchment area or point of comparison.**Conformance with MacBride principles:** As of December 2011, no information was available as to whether the company embodies the MacBride principles at its operations in Northern Ireland.**Affirmative action outreach:** As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.**Chill factor and neutral workplace:** As of December 2011, the company operated in Coleraine, a neutral location in Northern Ireland.**Grievances:** As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Cobain Mark t/a McDonald's Glengormley

Location	Belfast
Business	Fast food
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None**Available information:** See McDonald's Restaurants for more information on this franchise.**Compliance with Northern Ireland fair employment law and Code of Practice:** As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.

Underrepresentation analysis: Cobain Mark neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, no information was available as to whether the company embodies the MacBride principles at its operations in Northern Ireland.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Hewitt Geoff t/a McDonald's Ballymena

Location	Ballymena
Business	fast food
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: See McDonald's Restaurants for more information on this franchise.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.

Underrepresentation analysis: Hewitt Geoff neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, no information was available as to whether the company embodies the MacBride Principles at its operations in Northern Ireland.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Ballymena, a Protestant dominant location, which may raised concern in some of the Catholic employees.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

McDermott Paul t/a McDonald's Connswater

Location	Belfast
Business	fast food
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total

2010 Survey Response: None**Available information:** See McDonald's Restaurants for more information on this franchise.**Compliance with Northern Ireland fair employment law and Code of Practice:** As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.**Underrepresentation analysis:** McDermott Paul neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.**Conformance with MacBride principles:** As of December 2011, no information was available as to whether the company embodies the MacBride principles at its operations in Northern Ireland.**Affirmative action outreach:** As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.**Chill factor and neutral workplace:** As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.**Grievances:** As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

S & S Restaurants t/a McDonald's Restaurant

Location	Newry, county Down
Business	fast food
Employees	(Data as of 2011)
	Protestant 10
	Catholic 56
	Other 11
	<hr/>
	Total 77

2010 Survey Response: None**Available information:** See McDonald's Restaurants for more information on this franchise.**Compliance with Northern Ireland fair employment law and Code of Practice:** As of December 2011, no information was available regarding the company's fair employment policies and practices.**Underrepresentation analysis:** As of February 2011, both communities were fairly represented at S&S Restaurant's operations in Northern Ireland. According to the 2010 Equality Commission's Monitoring Report, S&S Restaurant's workforce consisted of 10 Protestants (15.2 percent), and 56 Catholics (84.8 percent). The workforce composition is reflective of the religious representation in Newry (20.1 percent Protestant and 79.9 percent Catholic). The company is engaged in the fast food

business. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, Newry was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of December 2011, no information was available as to whether the company embodies the MacBride principles at its operations in Northern Ireland.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company.

Chill factor and neutral workplace: As of December 2011, the company operated in Down, a Catholic dominant location, which may raised some concern in the Protestant employees.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Connan Paul Ltd.

Location	Belfast
Business	fast food
Employees	(Data as of 2011)
	Protestant 13
	Catholic 95
	Other 18
	<hr/> Total 126

2010 Survey Response: None

Available information: See McDonald's Restaurants for more information on this franchise.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at Connan Paul compared to the Belfast catchment area (51 percent Protestant and 49 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, Connan Paul's workforce consisted of 13 Protestants (12 percent), and 95 Catholics (88 percent). The company is engaged in the fast food business. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, Belfast is deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of December 2011, no information was available as to whether the company embodies the MacBride principles at its operations in Northern Ireland.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

North West Restaurants Ltd.

Location	3 in Londonderry
Business	fast food
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None**Available information:** See McDonald's Restaurants for more information on this franchise.**Compliance with Northern Ireland fair employment law and Code of Practice:** As of December 2011, no information was available regarding the company's fair employment policy policies and practices.**Underrepresentation analysis:** North West Restaurants Affiliate appeared in the 2011 Register of Employers but was missing in the 2010 Monitoring Report, meaning that the company most likely had between 11 to 25 employees.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, no information was available as to whether the company embodies the MacBride Principles at its operations in Northern Ireland.**Affirmative action outreach:** As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.**Chill factor and neutral workplace:** As of December 2011, the company operated in Londonderry, a Catholic dominant location, which may raised concern with some of the Protestant employees.**Grievances:** As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Merck & Co., Inc.

Operations in Northern Ireland:*Merck Sharp & Dohme*

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Merck Sharp & Dohme

Location	Sales people work from home
Business	Sales
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Merck maintains a small pharmaceutical sales force in Northern Ireland.

Compliance with Northern Ireland fair employment law and Code of Practice: Merck registered with the Equality Commission in 2002 and began to monitor the community background of its existing employees, as required by Northern Ireland fair employment law. The company disclosed in its previous survey response that it was fully committed to fostering a diverse work force. Its worldwide code of conduct was reinforced through mandatory employee training at all levels. The company code included a statement on the company's commitment to the fair treatment of all employees, a commitment that included non-discrimination.

Underrepresentation analysis: Merck Sharp & Dohme appeared in the 2011 Register of employers but was missing in the 2010 Monitoring Report, meaning that the company most likely had between 11 to 25 employees.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 2006, Merck told MSCI that its policies were compliant with the MacBride Principles. However, the company had not provided an update since then. As a result, the MacBride status was changed from compliant to unknown.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: In its previous survey response, the company told MSCI that its employees all worked from home. As a result, its employees appeared to face no chill factor or security concerns.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Microsoft Corporation

Operations in Northern Ireland:

Microsoft Ireland

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	12/1/2006	Affirmative Action	Yes	FET Settlements	0

Microsoft Ireland

Location	Belfast
Business	Software
Employees	(Data as of 2011)
	Protestant 4
	Catholic 6
	Other 6
	<hr/> Total 16

2010 Survey Response: Full

Available information: Microsoft Ireland offers computer software products in Northern Ireland. The company has consistently responded to the MSCI's Northern Ireland survey since 2007.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, Microsoft's policies adhered to fair employment laws in Northern Ireland. The company disclosed in its December 2010 survey response that implementation of the company's equality policy in Northern Ireland was overseen by the head office of Microsoft in Ireland. Employees were always notified of internal job openings. External job openings were advertised on the Internet, company intranet, and through third party employment agencies. The company occasionally interviewed candidates using a panel of multiple interviewers, who have been trained in equal opportunity employment issues.

Underrepresentation analysis: In 2011, Microsoft told MSCI that it only had 16 employees in Northern Ireland: four Protestants, six Catholics, and six non-affiliated.

MSCI's Northern Ireland Service refrains from drawing underrepresentation assessments when the company's workforce in Northern Ireland is not greater than 25 employees.

Conformance with MacBride principles: Microsoft reported in its November 2011 survey response that its policies continued to comply with the MacBride Principles. The local managers ensured compliance with the principles by providing training and communication.

Affirmative action outreach: In December 2010, Microsoft reported to MSCI that it still had an affirmative action agreement with the Equality Commission. However, the company did not elaborate about the affirmative action measures it has taken.

Chill factor and neutral workplace: As of December 2011, no chill factor concerns existed at Microsoft's operations in Northern Ireland. Although the company was located in a Protestant dominated industrial area that has seen sectarian tensions, Microsoft appeared to have sufficient policies in place to address this risk, specifically to its Catholic employees. Microsoft reported in its December 2010 survey response that it had policies in place (i.e. risk security and workplace dignity) to address and minimize security issues and chill factor concerns.

Grievances: No complaints have been filed against Microsoft at the Fair Employment Tribunal as of December 2011. In December 2010, Microsoft told MSCI that its workers can raise issues with someone other than their immediate supervisor; they can also file complaints confidentially, and through an independent person of the same community background.

NCR Corporation

Operations in Northern Ireland:

NCR Limited

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

NCR Limited

Location	Belfast
Business	Cash register, computer, terminal sales
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: NCR offers cash register, computer, and terminal sales equipment.

Compliance with Northern Ireland fair employment law and Code of Practice: NCR's practices outlined in past survey responses appeared to follow most fair employment guidelines in the Code of Practice. The company said it maintained a neutral workplace by "implementation of NCR shared values, availability of grievance procedures and reinforcement of normal good standards of behavior."

As of December 2011, this was the most recent information available.

Underrepresentation analysis: NCR Limited neither appeared in the 2011 Register of employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: According to NCR's previous survey responses, NCR had no arrangement for MacBride implementation. In 2002, it opposed a shareholder resolution on the matter. The resolution received 14.1 percent support. NCR said in its 2002 proxy statement that its policies and actions demonstrated its commitment to providing equality of opportunity and that endorsement or implementation of the MacBride Principles was not necessary.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal (FET).

Office Depot, Inc.

Operations in Northern Ireland:

Office Depot International Ltd.

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	5/1/2006	Affirmative Action	Unknown	FET Settlements	0

Office Depot International Ltd.

Location	Belfast
Business	Office supplies
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u>Total</u>

2010 Survey Response: None

Available information: Office Depot responded to the Northern Ireland Service survey in 2005 and 2006, but it has not responded since then.

Compliance with Northern Ireland fair employment law and Code of Practice: In its August 2006 survey response, ODI disclosed that its policies were in line with the Code of Practice. Managers at the Northern Ireland operations and the U.K. management oversaw the company's equality policy, ensuring that procedures were in line with standards issued by the Equality Commission. Site managers reported to the Director of Human Resources who then regularly produced an annual report on EEO programs for the UK and Ireland management board, and the Vice President of Human Resources Europe. Office Depot disclosed that it did not always publicly advertise available positions at the company, but it did notify all employees about open positions to internal applicants. The company posted its job ads with an Equal Employment Opportunity (EEO) statement at the Belfast Telegraph, the Internet, and the company intranet. The company reported to have always used interview panels that were comprised of members of both communities as part of its hiring procedures. The interviewers were not required to undergo EEO training, and the company did not systematically review the community composition of the applicant pool. Office Depot also reported that its redundancy policy stated clear selection criteria for redundancy selection.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: ODI neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In August 2006, the company disclosed that its policies were consistent with the MacBride Principles. As of December 2011, the company had not provided

an update regarding its compliance with the principles. As a result, the MacBride status was changed from Compliant to Unknown.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland. ODI also disclosed that it had neither reached an affirmative action agreement with the Equality Commission nor set any goals or timetables for recruitment or promotion of an underrepresented group.

Chill factor and neutral workplace: As of December 2011, ODI's office was located in a commercial area near downtown Belfast. This should not pose substantial chill factor to employees. The company disclosed in its August 2006 survey response that it had a health and safety policy that provided instructions on how to deal with threats. The firm also reported that it has given employees paid time off when violence had broken out in Belfast. All employees received training on anti-sectarianism in the workplace, using materials from the Equality Commission.

Grievances: As of December 2011, no complaints were filed against ODI at the FET. As of August 2006, the company disclosed to have procedures in place for employee complaints regarding religious or political discrimination.

Oracle Corporation

Operations in Northern Ireland:

Oracle Corporation UK Limited

MacBride Agreement	Unknown	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Oracle Corporation UK Limited

Location	Belfast
Business	Software development
Employees	(Data as of 2011)
	Protestant 27
	Catholic 32
	Other 6
	Total 65

2010 Survey Response: None

Available information: In January 2011, Oracle acquired Art Technology Group. Art Technology Group acquired Primus Knowledge Solutions, including the Belfast-based Amacis Company in November 2004. Oracle had not responded to the Northern Ireland Service survey.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available on the company policies because it had not responded to the Northern Ireland Service survey.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at Oracle Corporation UK compared to the whole of Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, Oracle Corporation UK's workforce consisted of 27 underrepresented Protestants (45.8 percent), and 32 Catholics (54.2 percent). The company is engaged in software development. This mostly requires high skilled workers, who are most likely to come from all over the province. As a result, the whole of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of December 2011, the company had not responded to request from the Northern Ireland Service and had not taken a stance on MacBride compliance.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company operated in Belfast, a neutral location in Northern Ireland.

Grievances: As of December 2011, no discrimination complaints were filed against the company at the Fair Employment Tribunal (FET).

Pepsico, Inc.

Operations in Northern Ireland:

Walkers Snacks Ltd.

MacBride Agreement	Unknown	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	3/1/2006	Affirmative Action	No	FET Settlements	0

Walkers Snacks Ltd.

Location	Antrim
Business	sale and marketing of snacks
Employees	(Data as of 2011)
	Protestant 22
	Catholic 11
	Other 0
	Total 33

2010 Survey Response: None

Available information: Walkers Snacks sells and distributes snacks, such as potato chips, in Northern Ireland. Pepsico U.K. & Ireland began selling Walkers Crisps in Northern Ireland in 1997 through a third-party distributor, LMI. PepsiCo U.K. bought LMI's sales and marketing operations in 2003. The company last responded to the Northern Ireland Service survey in 2006.

Compliance with Northern Ireland fair employment law and Code of Practice: In August 2006, the company told MSCI that its policies adhered to the fair employment laws in Northern Ireland. The company provided a copy of its "Human Rights at Work" policy which stated that it would comply

with all applicable laws, regulations, and other employment standards in its areas of operations. The policy also included non-toleration of discrimination and the provision of equal opportunity for all employees. Pepsico also provided a copy of its Code of Conduct, which contained information about its grievance procedures.

PepsiCo also provided details on its human resources procedures. The company said that it notified all of its employees when positions become available, but it did not always publicly advertise all job openings. When it did, the company used the local newspapers, the Internet, trade publications and the company intranet. Walkers always used an interview panel consisting of employees who have been trained in EEO issues when selecting candidates. However, the company did not indicate whether it sought to ensure that both communities were represented in the panel or whether it examined applicants' backgrounds to determine success rates by community. This practice is often used by companies to ensure fair candidate selection. When redundancies were necessary, the company used performance selection criteria or specified the role that would be eliminated. When selecting employees for promotion, the company evaluated skill sets, performance criteria, future potential and personal development goals. Training opportunities were based on providing specific skills to those whose roles were suited for the skill set.

As of December 2011, this was the most recent company fair employment policy.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Walker Snacks' operations in Northern Ireland. According to the 2010 Equality Commission's, Walkers Snacks' workforce consisted of 22 Protestants (66.7 percent), and 11 Catholics (33.3 percent). The workforce composition is reflective of the religious representation in the Antrim catchment area (61 percent Protestants and 38.5 percent Catholic). The company is engaged in the sale and marketing of snack foods. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, Antrim was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In August 2006, Pepsico told MSCI that its policies were compliant with the MacBride Principles. However, the company had not provided an update about its MacBride compliance in the last five years. As a result, the company's compliance status was changed from Compliant to Unknown.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Walkers Snacks was located in Antrim, an area that did not pose chill factor to members of either community.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal. In 2006, the company told MSCI that it maintained a grievance procedure which employees have to follow in filing a complaint.

Raytheon Company

Operations in Northern Ireland:

Raytheon Systems

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Raytheon Systems

Location	Derry, Co. Londonderry
Business	Software development center
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<u>Total</u>

2010 Survey Response: None

Available information: Raytheon has provided sporadic responses to the Northern Ireland Service survey. In 2005, it provided updated employment figures; in 2006, it submitted a full survey response. The company did not respond in 2007, and submitted only partial information in 2008. The company did not respond in 2009, 2010 and 2011. Employment appears to have fallen short of initial goals, and the company announced in 2003 that there would be some redundancies.

Some human rights activists have opposed Raytheon's presence in Derry because of its weapons manufacturing operations. However, the company previously told MSCI that its facility in Northern Ireland only developed software and was not directly involved in arms production.

Compliance with Northern Ireland fair employment law and Code of Practice: In June 2006, Raytheon Systems told MSCI that its U.K. management continued to be responsible for overseeing the company's equality policy in Northern Ireland. The company also disclosed that its policies follow the recommendations and legal requirements in the fair employment Code of Practice. In addition, the company disclosed that it occasionally consulted with trade unions or other worker representatives on equality policy issues. The company had procedures in place for reporting grievances related to religious and political discrimination. These include filing a complaint confidentially to someone other than the direct supervisor, or to an independent person of the same community background. The company's job openings were not always publicly advertised. The company advertised its job ads through the Belfast Telegraph, local or regional papers, the Internet, the company intranet, and recruitment agencies. The company's employees were always notified of positions open to internal applicants. The company reported that those involved in candidate selection were trained on equal employment issues. The company also disclosed to have seldom reviewed its applicant pool to determine success rates by community.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: Raytheon Systems neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of July 2008, Raytheon System's policies did not appear to be compliant with with the MacBride Principles.

The company has not reached an agreement with shareholder proponents on the MacBride Principles and has opposed shareholder resolutions asking it to implement them. In 2004, investors only gave gave 10.1 percent support to a shareholder resolution asking for MacBride implementation. In 2005, a similar proposal got a 9.8 percent support.

Affirmative action outreach: As of December 2011, Raytheon Systems did not provide information regarding its affirmative action policies in Northern Ireland. The company had not provided any new information to MSCI since 2006.

Chill factor and neutral workplace: According to the 2001 Northern Ireland census, Derry was a largely Catholic dominated community. Protestants accounted for less than 10 percent of the area; they may feel uncomfortable arriving and leaving the Raytheon's facility. However, as of December 2011, Raytheon's policies appeared to be sufficient in addressing chill factor concerns.

In June 2006, Raytheon Systems told MSCI that its policies promoted a harmonious working environment and an inclusive culture. In addition, the company disclosed that its supervisors and management-level employees were given training on anti-sectarianism and intimidation, based on materials from the Equality Commission.

In its previous survey responses, Raytheon Systems stated that it maintained an electronic surveillance and secured entry system in place at its facilities. The company also reported that it actively promoted its stance against any form of harassment and banned display of any contentious material including slogans, banners and football colors.

Grievances: As of December 2011, no complaints were filed against the company at the FET. In its June 2006 survey response, Raytheon Systems disclosed that it had procedures in place for reporting grievances related to religious and political discrimination. These include filing a complaint confidentially to someone other than the direct supervisor, or to an independent person of the same community background.

Regis Corporation

Operations in Northern Ireland:

Supercuts (UK)

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Supercuts (UK)

Location	Belfast
Business	salon
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Regis Corporation's subsidiary, Supercuts, maintains several locations in Northern Ireland. As of December 2011, Supercuts' Web site listed four locations in downtown Belfast. The company did not respond to the Northern Ireland Service's survey in 2009, 2010 and 2011.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Supercuts (UK) neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: As of December 2011, there was no evidence to suggest that the company's policies were compliant with the MacBride Principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Supercuts employees faced no security concerns as the company operated in Belfast, a neutral area.

Grievances: As of December 2011, no complaints were filed against affiliate at the FET.

Sonoco Products Company

Operations in Northern Ireland:

Sonoco Alcore Ltd

MacBride Agreement	Unknown	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	12/1/1991	Affirmative Action	Unknown	FET Settlements	0

Sonoco Alcore Ltd

Location	Lurgan, Co. Armagh
Business	Converted paper tubes manufacturing
Employees	(Data as of 2011)
	Protestant 14
	Catholic 18
	Other 1
	<u>Total 33</u>

2010 Survey Response: None

Available information: Sonoco Alcore responded to the Northern Ireland Service survey until 2006. It has not responded since then. Company officials met with Northern Ireland Service staff in 1990.

Compliance with Northern Ireland fair employment law and Code of Practice: In its 2006 survey response, Sonoco Alcore disclosed that its policies reflect fair employment standards.

Underrepresentation analysis: As of February 2011, Protestants were underrepresented at Sonoco Alcore compared to the Craigavon total travel to work area (59.2 percent Protestant). According to the Equality Commission's 2010 Monitoring Report, Sonoco Alcore's workforce consisted of 14 Protestants (43.8 percent), and 18 Catholics (56.3 percent). The company is engaged in the manufacture of converted paper tubes, which requires low skilled workers who are likely to come from nearby areas. As a result, the Craigavon travel to work area was the most appropriate catchment area.

Conformance with MacBride principles: In its 2006 survey response, Sonoco disclosed that its policies reflect the fair employment standards embodied in the MacBride Principles. However, the company has not provided an update since then. As a result, the MacBride status was changed from compliant to unknown.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, it was unclear if Sonoco employees faced chill factor or security concerns at work.

Grievances: No claims were filed against the company at the Fair Employment Tribunal as of January 2011.

The Allstate Corporation

Operations in Northern Ireland:*Allstate Northern Ireland*

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	11/1/2000	Affirmative Action	No	FET Settlements	0

Allstate Northern Ireland

Location	Belfast, Londonderry, and Strabane
Business	Software and Contact Center
Employees	(Data as of 2011)
	Protestant 566
	Catholic 1026
	Other 435
	<u>Total 2027</u>

2010 Survey Response: Full

Available information: NorthBrook Technology opened its Belfast facilities in 1999 and changed locations within Belfast in 2002. The company's name had since changed to Allstate Northern Ireland. Company representatives stated that they were focused on recruiting workers from Poland and India because they believed there was a lack of skilled IT workers in Northern Ireland.

Compliance with Northern Ireland fair employment law and Code of Practice: In November 2011, Allstate Northern Ireland told MSCI that its Northern Ireland senior management continued to be responsible for overseeing the company's equality policy. The company disclosed that it had procedures in place for reporting grievances related to religious and political discrimination. These included filing a complaint confidentially to someone other than the direct supervisor, or to an independent person of the same community background. The company had always advertised its jobs through the Belfast Telegraph, other local or regional newspapers, job markets, the internet, company intranet, universities, poster boards, local radio, Facebook, and YouTube. As for the company's hiring procedures, the candidates were always interviewed by a panel with multiple interviewers from both communities that had undergone equal opportunity employment training. The company also disclosed that it regularly examined the religious composition of its applicants and new hires to determine community success rates.

Underrepresentation analysis: As of December 2011, Protestants were underrepresented at Allstate Northern Ireland compared to all of Northern Ireland (57.3 percent) for its Belfast and Londonderry offices, and the Strabane total travel to work area (35.4 percent) for its Strabane office. The company's November 2011 survey response provided the workforce breakdown for each of Allstate Northern Ireland's three offices. The company also disclosed that it engaged in software and contact center operations, which required both high and low skilled employees. The company's Belfast office employed 458 Protestants (47.4 percent), and 509 Catholics (52.6 percent), while the Londonderry office employed 46 Protestants (16.79 percent), and 228 Catholics (83.21 percent). Management and professional occupations accounted for more than three-quarters of the workforce in the Belfast and Londonderry offices, which attract applicants from all over the province. Therefore, all of Northern Ireland is considered the appropriate catchment area. The Strabane office's workforce consisted of 62 Protestants (17.66 percent), and 289 Catholics (82.34 percent). Most of the employees in this location were employed under sales and customer service, which attract employees from nearby areas. As a result, the Strabane total travel to work area was deemed the most appropriate catchment area.

Conformance with MacBride principles: In November 2011, Allstate Northern Ireland told MSCI that its policies continued to reflect the fair employment standards embodied in the MacBride Principles. The company reached an agreement on MacBride implementation in November 2000.

Affirmative action outreach: In November 2011, Allstate Northern Ireland told MSCI that it did not have an affirmative action agreement with the Equality Commission.

Chill factor and neutral workplace: As of December 2011, Allstate Northern Ireland did not provide information regarding this issue. However, in its November 2011 survey response, Allstate Northern Ireland disclosed that all employees were given training on anti-sectarianism and intimidation, using materials from the equality commission.

Grievances: As of December 2011, no complaints were filed against the affiliate at the FET. In its November 2011 survey response, Allstate Northern Ireland disclosed that it had procedures in place for reporting grievances related to religious and political discrimination. These included filing a complaint confidentially to someone other than the direct supervisor, or to an independent person of the same community background.

The Coca-Cola Company

Operations in Northern Ireland:

Coca-Cola HBC NI Ltd

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	9/1/2004	Affirmative Action	Yes	FET Settlements	2

Coca-Cola HBC NI Ltd

Location	Lisburn, Co. Antrim
Business	Soft drinks manufacturing, sales, and distribution
Employees	(Data as of 2011)
	Protestant 415
	Catholic 250
	Other 50
	Total 715

2010 Survey Response: None

Available information: As of December 2011, Coca Cola owned 24 percent of Coca-Cola Hellenic Bottling Company (Coca-Cola HBC). Coca-Cola HBC is based in Greece and owns bottling operations in Northern Ireland, Coca-Cola HBC Northern Ireland (formerly Coca-Cola Bottlers (Ulster) Ltd). In 2005, Coca-Cola announced that it would build a new USD50 million production facility in Northern Ireland.

The company has responded in full to the Northern Ireland Service survey for the past few years, except in 2011.

Coca-Cola is engaged in the production and sale of beverage concentrates and syrups, which it sells to more than 300 bottling companies with which Coke has business relationships. Coca-Cola HBC's policies, management and governance structure are separate from Coca-Cola's, although the two work together to find common ground and take common action in many areas.

Compliance with Northern Ireland fair employment law and Code of Practice: In November 2010, Coca-Cola HBC NI Ltd told MSCI that its Northern Ireland senior management continued to be responsible for overseeing the company's equality policy. The company also disclosed that it

occasionally consulted with trade unions or other worker representatives on equality policy issues. In addition, the company disclosed that it had procedures in place for reporting grievances related to religious and political discrimination. This includes filing a complaint confidentially to someone other than the direct supervisor. The company publicly advertised its job ads through the Belfast Telegraph, the Internet, and the company intranet. Employees were always notified about positions open to internal applicants. As for the company's hiring procedures, the candidates were always interviewed by a panel with multiple interviewers. These interviewers were occasionally represented by members of both communities. In its October 2009 survey response, Coca-Cola HBC disclosed that it continued to examine the religious composition of its applicants and new hires to determine community success rates.

The company stated that its operations adhere to the standards of the Northern Ireland fair employment law and Code of Practice. It has provided the Northern Ireland Service with a copy of its employee handbook, which describes the company's EEO and harassment policies in detail.

In its previous survey response, the company stated that most jobs were advertised externally. The company also used an internal promotion track to move up sales employees to higher positions. Employees were given an EEO and harassment training, outlining their personal responsibility as employees and the consequences of non-compliance. The company disclosed that it managed all redundancies according to the specific circumstances, and never made employees redundant on a "last in, first out basis". All redundancies were managed in concert with the company's trade union.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Coca-Cola HBC NI compared to the Lisburn district council area (68.5 percent Protestant, 31.5 percent Catholic). According to the Equality Commission's 2010 Monitoring Report, Coca-Cola HBC NI's workforce consisted of 415 Protestants (62.4 percent), and 250 Catholics (37.6 percent). The company is engaged in the manufacture and bottling of softdrinks, which mostly requires low skilled workers that are likely to come from nearby areas. As a result, the Lisburn district council travel to work area was deemed the most appropriate catchment area.

Conformance with MacBride principles: In November 2010, Coca-Cola HBC NI Ltd told MSCI that its policies continued to reflect the fair employment standards embodied in the MacBride Principles.

In September 2004, Coca-Cola told the New York City Comptroller William Thompson that it was committed to take lawful steps in good faith to conduct business in Northern Ireland in accordance with the fair employment standards embodied in the MacBride Principles.

In a report released in 2006, New York City Comptroller William C. Thompson, Jr., said as Coca-Cola agreed to urge franchise holders in Northern Ireland to implement the principles and adhere to fair employment standards to foster a diverse workforce. Coca-Cola also promised to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach: In November 2010, Coca-Cola HBC NI Ltd told MSCI that an affirmative action agreement with the Equality Commission was not warranted. However, the company placed an equal employment opportunity statement in its job ads, and made use of job markets in specific areas as part of its affirmative action efforts to increase applicants from the underrepresented group in the company. The company also reported to have taken measures and held discussions with trade unions to ensure that redundancies do not have a disproportionate impact on one group.

Chill factor and neutral workplace: In its July 2008 survey response, Coca-Cola HBC NI Ltd stated that it had no issues with chill factor or security. In July 2007, the company told MSCI that all employees underwent training on anti-sectarianism and intimidation, utilizing materials from the

Equality Commission and the company's local consultants. The company disclosed that its redundancy policy was designed to ensure no discrimination.

Grievances: As of December 2011, no complaints were filed against the company at the FET. Two separate complaints were filed in 2008 by the same plaintiff before the FET. Both claims were withdrawn after settlement in May 2009. The head of the Human Resources department believed that the company may have settled cases in the past to save time and money, but said she would discourage this approach if an incident occurred in the future. The company had a grievance policy in place that allows for employees to file confidential complaints and to bring issues to someone other than their immediate supervisor, including a colleague who shares the same community background.

The Dun & Bradstreet Corporation

Operations in Northern Ireland:

Dun & Bradstreet Ltd.

MacBride Agreement	No	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0

Dun & Bradstreet Ltd.

Location	Bangor
Business	Credit services information
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total

2010 Survey Response: None

Available information: Dun & Bradstreet last responded to the Northern Ireland survey in 2008. The company said that its practices adhered to Northern Ireland fair employment law, but it never agreed to MacBride implementation and opposed shareholder resolutions on the subject over the years.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Dun & Bradstreet neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 2008, the company told MSCI that its practices adhered to Northern Ireland fair employment law, but it never agreed to MacBride implementation and opposed shareholder resolutions on the subject over the years.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, it was unclear if Dun & Bradstreet employees faced chill factor at the company's operations in Northern Ireland.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal.

The Estee Lauder Companies Inc.

Operations in Northern Ireland:

Estee Lauder Cosmetics Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	3/1/1998	Affirmative Action	No	FET Settlements	0

Estee Lauder Cosmetics Ltd.

Location	Belfast
Business	sale of cosmetic products
Employees	(Data as of 2011)
	Protestant 34
	Catholic 44
	Other 9
	Total 87

2010 Survey Response: None

Available information: In 2005, Estee Lauder reported its largest staff ever in Northern Ireland at 128 workers; it fell to 95 workers in mid-2006, then 60 by the end of 2007, and increased again to 87 in 2010. The company only employed sales associates, who handled cosmetics sales in department stores around the province.

Compliance with Northern Ireland fair employment law and Code of Practice: As of July 2008, Estee Lauder Cosmetics told MSCI that its policies and practices adhered to the Code of Practice. Estee Lauder's personnel policies encouraged the systematic practices favored by the Code, and although there was no specific reference to religious discrimination in the Northern Ireland context, Estee Lauder's recruitment manual urged the use of an objective criteria and not "race, religion or gender" as basis of selection. The company publicly advertised all job openings, using the Belfast Telegraph, local and regional newspapers, company intranet, and government job markets. In addition, employees involved in selecting candidates for hire received proper EEO training. Panel interviews were conducted by representatives from both communities. A review of the religious composition of the applicants and new hires were regularly carried out to determine success rates

by community. Redundancies were based on "competence, conduct, attendance and service," which were also the criteria for promotion. The U.K. management team was held responsible for implementing the company's equality policy in the country.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, neither community was underrepresented at Estee Lauder Cosmetics compared to the Belfast district council area (51 percent Protestant and 49 percent Catholic). According to the 2010 Equality Commission's Monitoring Report, Estee Lauder Cosmetic's workforce consisted of 34 Protestants (43.6 percent) and 44 Catholics (56.4 percent). The company is engaged in the cosmetics business, which is most likely to require low skilled workers. Considering the company's business type, the Belfast district council area was deemed the appropriate catchment area.

Conformance with MacBride principles: In July 2008, the company told MSCI that it had an agreement with shareholder proponents of the MacBride Principles in 1998.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company was located in Belfast, a neutral area for both communities. As a result, employees faced no chill factor or security risks. As of July 2008, the company told MSCI that employees generally work in large department stores in neutral shopping districts where harassment incidents were unlikely.

Grievances: As of December 2011, no recent complaints have been filed against the company at the Fair Employment Tribunal.

The Gap, Inc.

Operations in Northern Ireland:

GPS (Great Britain) Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	No	FET Settlements	0

GPS (Great Britain) Ltd.

Location	Belfast (2 locations) and Banbridge	
Business	Retail clothing	
Employees	(Data as of 2011)	
	Protestant	30
	Catholic	16
	Other	6
	Total	52

2010 Survey Response: None

Available information: The Gap (Gap) owns and operates three retail clothing stores in Northern Ireland. These stores are part of Gap's subsidiary GPS (Great Britain) Ltd. The company last responded to MSCI's Northern Ireland survey in 2010.

Compliance with Northern Ireland fair employment law and Code of Practice: In December 2010, Gap told MSCI that it continued to comply with local employment laws, the Code of Practice, and the MacBride Principles. The company included an EEO statement in its advertisements and always notified employees about positions open to internal applicants. It also recruited through government-sponsored job fairs held in designated areas. Employees involved in candidate selection occasionally received equal employment training; the company also said it only authorized managers trained in applicant screening and interviewing to recruit candidates. According to the company, all employees have participated in training on workplace discrimination issues; they may contact their line manager, district manager or human resources department to express any concerns. Gap's human resources department continued to monitor the company's work force composition. The district, regional human resources and recruitment managers all visited regularly to confirm that the fair employment procedure was being followed. Moreover, U.K. management oversaw the company's equality policy. The company added that its district manager and human resources support were trained to monitor employment practices and come up with improvements.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at GPS's operations in Northern Ireland. According to the 2010 Equality Commission's, GPS's workforce consisted of 30 Protestants (65.2 percent), and 16 Catholics (34.8 percent). The workforce composition is reflective of the religious representation in the Belfast total travel-to-work catchment area (67 percent Protestant and 33 percent Catholic). The company is engaged in the garment business. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, the Belfast total travel-to-work area was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In December 2010, Gap told MSCI that its policies continued to reflect the fair employment standards embodied in the MacBride Principles.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at Gap.

Chill factor and neutral workplace: As of December 2011, the company's locations in downtown Belfast did not pose a chill factor to either Catholics or Protestants.

Grievances: No complaints have been filed against Gap at the Fair Employment Tribunal as of December 2011. In December 2010, Gap told MSCI that it maintained a grievance policy that strictly outlined formal and informal procedures for dealing with complaints and allowed the parties to appeal a decision twice before a senior manager renders a final decision. The company encouraged employees to relay grievances to their supervisors, their supervisor's superior, or human resources. The company also had an employee assistance program, called LifeWorks, which provided advice and support to employees dealing with workplace issues.

The Goodyear Tire & Rubber Company

Operations in Northern Ireland:

*Goodyear Dunlop Tyres UK Ltd.**Hi-Q Tyre Service*

MacBride Agreement	Unknown	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	11/1/2000	Affirmative Action	Unknown	FET Settlements	0

Goodyear Dunlop Tyres UK Ltd.

Location	not disclosed
Business	Tyre services and sales
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Goodyear previously had a stake in Dunlop Tyres through a joint venture with Sumitomo Rubber Industries; this venture was dissolved and the retail operations were sold to third parties in 2002. The company responded to the 2009 survey with a letter confirming it had only one sales employee in Northern Ireland. As of December 2011, Goodyear also had franchises in Northern Ireland operating under the name Hi-Q Tyre Service.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2009, Goodyear told MSCI that Dunlop Tyres intended to implement fair employment practices embodied in the MacBride Principles. The New York City Comptroller's office added the company to its list of firms with agreements on implementation in 2000.

Goodyear was at one time a major Northern Ireland employer, but it closed a large manufacturing plant there in the early 1980s. The company declined to provide additional details about its operations in Northern Ireland since it only had minimal activities in the province.

Underrepresentation analysis: Goodyear Dunlop Tyres neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: The company signed an agreement with the MacBride proponents in 2000.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, it was unclear as to whether the company has chill problems or security concerns.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Hi-Q Tyre Service

Location	28 locations province-wide
Business	Tyre services
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Hi-Q Tyre Service's stores in Northern Ireland are all owned and operated by dealer partners or franchisees of Goodyear, and are not directly controlled by it. Goodyear authorizes these dealers to use the Hi-Q Tyre Service designation in signage.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Hi-Q Tyre Service neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: The company signed an agreement with the MacBride proponents in 2000.

Affirmative action outreach: As of December 2011, the company did not appear to be undertaking affirmative action measures.

Chill factor and neutral workplace: As of December 2011, it was unclear as to whether the company has chill problems or security concerns.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

The Procter & Gamble Company

Operations in Northern Ireland:

P&G, P&G Health & Beauty Care, Max Factor

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	12/1/1991	Affirmative Action	Unknown	FET Settlements	0

P&G, P&G Health & Beauty Care, Max Factor

Location	sales people work mostly from home
Business	Sales of consumer products
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: P&G sells consumer products in Northern Ireland. In 2008, the company told MSCI that total work force in the country has decreased from 29 in 1999 to four during the year.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available about the company's fair employment policies and practices at its operations Northern Ireland.

Underrepresentation analysis: P&G neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In May 2007, the company told MSCI that it reached an agreement with shareholders on MacBride implementation in 1991. In 2002, the company disclosed that it was "committed to equal opportunity and fair employment" and is making "all necessary and lawful efforts to implement the MacBride Principles." The company reported that specific questions on adherence to the Code of Practice and implementation of the MacBride Principles "are more appropriate to companies with more significant operations in Northern Ireland."

Affirmative action outreach: As of December 2011, no information was available as to whether the company has undertaken any affirmative action steps at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company's employees faced no chill factor concerns as they worked mostly from home.

Grievances: As of December 2011, no claims were filed against the company in the Fair Employment Tribunal (FET).

The TJX Companies, Inc.

Operations in Northern Ireland:

T.K. Maxx

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	4/1/2009	Affirmative Action	No	FET Settlements	0

T.K. Maxx

Location	Belfast, Craigavon, Lisburn, Newry, Newtonabbey, Coleraine, Bangor, Boucher Rd, Ballymena, Lisnagelvin	
Business	Retail clothing	
Employees	(Data as of 2011)	
	Protestant	228
	Catholic	196
	Other	30
	Total	454

2010 Survey Response: None

Available information: TJX responded to the Northern Ireland Service survey from 2006 to 2009. TJX did not send a response in 2010 and 2011.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2009, TJX told MSCI that its were designed to provide equality of opportunity in employment, irrespective of religious belief, political opinion, sex, marital status, race, ethnic origin, sexual orientation or age. Recruitment and selection were based on merit without regard to any of these factors, including religious belief, community background, or political opinion. The company's senior management in Northern Ireland continued to be responsible in overseeing the company's equality policy.

Job openings were often advertised via local newspapers, recruitment agencies, and the Internet. Employees were always notified of internal job openings. Job candidates were always interviewed by a panel with multiple interviewers that have representation from both communities. The company added that the panelists have undergone opportunity employment training. The company also regularly monitored religious composition of applicants and new hires to determine community success rates. As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at T.K. Maxx's operations in Northern Ireland. According to the 2010 Equality Commission's Monitoring Report, T.K. Maxx's workforce consisted of 228 Protestants (53.8 percent), and 196 Catholics (46.2 percent). The workforce composition is reflective of the religious representation in Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic). The company is engaged in the retail business. Considering the multiple location of T.K. Maxx's stores, all of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: In 2009, TJX told MSCI that its policies were compliant with the MacBride Principles.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, there were no chill problems at T.K. Maxx. As of 2009, there were ten T.K. Maxx stores in Northern Ireland, some of which were located areas that could pose a chill factor for one of the communities. Catholic employees may face chill problems in T.K. Max's Protestant dominated locations such as Newtownabbey, Craigavon, Coleraine, Ballymena, and Lisburn. On the other hand, Protestant employees may feel intimidated in Newry, a Catholic dominated area. Employees do not face security concerns in Belfast, a neutral area either Protestants or Catholics.

In August 2006, Republican splinter group, the Real IRA claimed responsibility for fire-bombing a TK Maxx store in Newry as well as three other stores. According to press reports, the bombing caused severe damage to the store, but no deaths or injuries. The attack was done in remembrance of the anniversary of the now-defunct British policy of internment, whereby suspected offenders could be jailed without trial. Another press report revealed that a truck carrying T.K. Maxx merchandise was hijacked in Co. Louth in April 2006. As of December 2011, no new incidents were reported.

In 2009, TJX told MSCI that all its employees regularly received training on sectarian harassment from internal legal advisers.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal.

The Walt Disney Company

Operations in Northern Ireland:

The Disney Store

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	11/1/1996	Affirmative Action	Unknown	FET Settlements	0

The Disney Store

Location	Belfast
Business	Specialty retail
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: The Walt Disney Co. maintains a branch of The Disney Store in Northern Ireland. The store opened in Belfast in late 1994. The company has since sporadically provided detailed responses regarding its operations to MSCI's Northern Ireland Service.

Compliance with Northern Ireland fair employment law and Code of Practice: According to MSCI's past analysis, the company's recruitment and hiring procedures generally appeared to be consistent with fair employment law and the Code of Practice, although the company's grievance procedure made no mention of political or religious discrimination. The company noted in 1995 that its policy "doesn't mention any discrimination so it isn't directly excluding" consideration of political or religious grievances. All of the company's vacancies were advertised by the Training and Employment Agency in Northern Ireland. As of December 2011, Walt Disney has not provided an update regarding its fair employment policies.

Underrepresentation analysis: The Disney Store neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10

employees or less. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In November 2009, Walt Disney told MSCI that its policies were in compliance with MacBride Principles. The company reached an agreement on implementation of the MacBride Principles after discussions with the New York City Comptroller's office in 1996, although it reported in 1998 that it had not formally endorsed the principles.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Walt Disney's store in Belfast did not pose chill factor or security concerns either to Protestants or Catholics.

Grievances: As of December 2011, no complaints were filed against Walt Disney at the FET. In November 2009, the company told MSCI that its grievance procedure provided for filing complaints confidentially, to someone other than the direct supervisor, or to human resources.

United Technologies Corporation

Operations in Northern Ireland:

Otis Ltd

Toshiba Carrier UK

Chubb (Northern Ireland) Ltd

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	Yes		
Agreement Date	1/1/2001	Affirmative Action	Yes	FET Settlements	0

Otis Ltd

Location	Belfast
Business	elevator sales, service, repair, and installation
Employees	(Data as of 2011)
	Protestant 21
	Catholic 12
	Other 2
	Total 35

2010 Survey Response: None

Available information: Otis Elevator last responded to the Northern Ireland survey in 2009.

Compliance with Northern Ireland fair employment law and Code of Practice: Otis' workplace standards appeared to be in line with the Code of Practice. The company stated that promotion and training programs were based on analysis of performance, business, and individual needs. Job advertisements were placed in the Belfast Telegraph and Irish News, and included an EEO statement. The company always notified all employees about positions open to internal applicants. Structured interviews made use of two-person panels and allowed only pre-determined questions

related to job criteria. The company stated that both communities were always represented in interview panels. All employees involved in candidate selection received equal employment training, and the company provided all management and supervisors with in-house equal opportunities training, using materials from the Equality Commission. Layoff procedures were not conducted on a "last-in, first-out" basis. The criteria used were performance, service, attendance and disciplinary record.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Otis' operation in Northern Ireland. According to the Equality Commission's 2010 Monitoring Report, Otis' workforce consisted of 21 Protestants (63.6 percent), and 12 Catholics (36.4 percent). The workforce composition is reflective of the religious representation in Belfast total travel to work area (67 percent Protestant and 33 percent Catholic). The company is engaged in elevator sales, service, repair, and installation, which requires low skilled personnel who are most likely to come from nearby areas. As a result, the Belfast total travel to work area was deemed the most appropriate catchment area.

Conformance with MacBride principles: In July 2007, Otis Elevator told MSCI that its policies reflect the fair employment standards embodied in the MacBride Principles. The company reached an accord on MacBride implementation in 2001.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operation in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, Otis employees faced no chill factor as the company operated in Northern Ireland, a neutral area.

Grievances: As of December 2011, no complaints were filed against Otis at the FET. Otis disclosed that its harassment policy specifically outlined steps a complainant may take in order to file a grievance. Provisions were made for complaints to be handled by an independent human resources staff. The company's survey response stated that its grievance procedure also allows employees to file a complaint confidentially. It also disclosed that the company's staff may raise issues with someone other than a direct supervisor or to someone of the same community background.

Toshiba Carrier UK

Location	Belfast
Business	Air conditioning and refrigerator installation & maintenance
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total

2010 Survey Response: None

Available information: Employment at Toshiba Carrier has remained steady at around 10 employees for the past several years.

Compliance with Northern Ireland fair employment law and Code of Practice: In its previous survey response, Toshiba Carrier stated that it adhered to Northern Ireland fair employment law

and the Code of Practice. It had also provided copies of its policies to the Northern Ireland Service. The company's job advertisement, hiring, and neutral workplace policies appeared to be consistent with good practices recommended by fair employment experts in Northern Ireland. The employees involved in personnel decisions have all received training on EEO matters.

UTC stated that it continued to be concerned that it was seen as an equal employment opportunity employer. The company also stated that it continued to issue a welcoming statement and EEO statement in ads concerning vacancies; job applicants were judged and appointed based only on merit. In 2001, Toshiba Carrier adopted a new EEO policy based on the MacBride Principles and the U.K. legislation. This has been regularly updated and circulated to all employees and is included in all new employee orientation packs, displayed on notice boards, and made available on the company intranet.

Underrepresentation analysis: Toshiba Carrier UK neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 2001, the company reached an accord on MacBride implementation with activists, following negotiations on a shareholder resolution that was withdrawn.

Affirmative action outreach: In its previous survey response, UTC reported that Toshiba Carrier UK had adopted a variety of job advertisements and candidate attraction techniques in order to balance its workforce.

Chill factor and neutral workplace: A company representative reported that it moved locations within Belfast so that it could operate in a more neutral area of the city.

Grievances: As of December 2011, no complaints were filed against the company at the FET.

Chubb (Northern Ireland) Ltd

Location	Belfast
Business	provision of security and fire protection systems
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/>
	Total 61

2010 Survey Response: None

Available information: In 2003, United Technologies acquired Chubb, a spin-off of the former Williams PLC. The company provides electronic security systems, fire protection systems, security guards, and security system monitoring. Its operations are headquartered in Dublin. In 2005, the company told the Northern Ireland Service that its only Northern Ireland site was located in Belfast.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2006, Chubb provided copies of its EEO, grievance, affirmative action and harassment policies to the Northern Ireland Service. These policies were in line with fair employment laws in Northern Ireland. The

company reported that it used the Northern Ireland Service's 2004 profile to help revise its Equal Opportunities Policy to address discrimination, particularly in political and religious beliefs. The company changed its hiring and selection processes to ensure all interviewers have received EEO training. The company also made efforts to have representation from both communities on interview panel, but admitted that this cannot always be achieved due to the small number of employees available to sit on such panels.

Chubb continued to publicly advertise all job openings and post them internally to alert its staff. The company included an EEO statement in its job advertisements and posted them in the Belfast Telegraph, the Irish News, the Internet, the company intranet, and in other local newspapers. The company also disclosed that it reviewed the religious composition of applicant pools and new hires to determine success rates by community.

The company's human resources team continued to be responsible for ensuring equal opportunity employment. The senior management made sure that those opportunities were present at the at the operational level.

As of December 2011, this was the most recent information available.

Underrepresentation analysis: As of February 2011, Catholics were underrepresented at Chubb Northern Ireland compared to the Belfast total travel to work area (33 percent Catholic). According to the Equality Commission's February 2011 Monitoring Report, Chubb had fewer than 10 Catholic employees in a workforce of 61 employees. In the best case scenario where Catholic employees amounted to nine, they would comprise 14.8 percent of the company workforce. The company is engaged in the sale of security and fire protection systems, which mostly requires low skilled workers that come from nearby areas. As a result, the Belfast total travel to work area was deemed the most appropriate catchment area.

Conformance with MacBride principles: In its 2006 survey response, Chubb reported that its policies reflected the MacBride Principles. However, the company has not provided an update since then. As a result, the status of the company's MacBride compliance was unclear.

Affirmative action outreach: In 2005, Chubb told MSCI that it planned to aggressively extend its recruiting efforts for the underrepresented group. In 2005, the company also told MSCI that its goal was to increase the Catholic percentage of the work force by a few percentage points by June 2006. It had succeeded in these efforts, but Catholics continued to be underrepresented as of February 2011. Chubb's affirmative action policy set out a process by which community representation of the staff were monitored bi-annually to determine whether there is an imbalance and if affirmation action measures are necessary. Additional actions were planned to be developed to address any factors limiting success.

In 2005, Chubb began placing its job ads in the Irish News to attract more Catholic applicants, which made up the majority of this publication's readership. The company included an EEO statement in any form of job advertisement, and took advantage of job markets in predominately Catholic areas. As part of its affirmative action efforts, company representatives told the Northern Ireland Service that they considered offering an additional financial incentive to its sales employees who obtain contracts in predominately Catholic areas in order to boost in the Catholic representation in the work force.

Chill factor and neutral workplace: As of December 2011, Chubb's office is in Belfast, which is considered a neutral area for both communities.

Grievances: As of December 2011, no complaints were filed against Chubb at the FET. Chubb and the trade union representing its workers have developed a grievance policy, which includes provisions for a formal hearing and/or the use of an arbitration body. The UTC dialog and ombudsman programs also provided a confidential and secure environment for employees to raise complaints.

Vornado Realty Trust

Operations in Northern Ireland:

Toys 'R' Us

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	No	FET Settlements	0

Toys 'R' Us

Location	Belfast, Lisburn and Londonderry
Business	Toy retailing
Employees	(Data as of 2011)
	Protestant 60
	Catholic 46
	Other 9
	Total 115

2010 Survey Response: None

Available information: In July 2005, Bain Capital Partners LLC, Kohlberg Kravis, Roberts & Co. (KKR), and Vornado Realty Trust, completed its acquisition, encompassing all worldwide operations of Toys 'R' Us. Each of the investors owned an equal stake in the company. The company's initial response to monitoring by the Northern Ireland Service came in 1999, when it also met with Service staff. The company has three stores that sold toys, baby care and family leisure and home entertainment multimedia products.

Compliance with Northern Ireland fair employment law and Code of Practice: As of May 2007, the company told MSCI that it continued to be an equal opportunity employer that fully complied with all aspects of Northern Ireland fair employment law. Its policies and programs were consistent with the Fair Employment and Fair Treatment Order 1998 and the Code of Practice. The company reported that all procedures and policies were agreed with the Equality Commission prior to any recruitment activities. In addition, managers attended the Equality Commission training, and policies were posted in all stores. The company notified employees about positions open to internal applicants. All employees were also able to receive training on equal employment issues. According to the company, Toys 'R' Us had no need to widely advertise jobs; signs posted in its Belfast store generated sufficient numbers of applicants. During panel interviews, the company ensured that both communities were represented. The company added that it systematically tracked applicant success rates by religion. Employees were promoted based on merit. Promotions were usually for the managerial posts.

Local management held the responsibility of complying with local fair employment legislation. As recommended by the Equality Commission, the local management also handled responses to questions about religious affiliation, which were sent to independent personnel departments at the head office. A confidential help line was also provided for employees to voice questions or concerns.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Toys 'R' Us operations in Northern Ireland. According to the 2010 Equality Commission's Monitoring Report, Toys R Us' workforce consisted of 60 Protestants (56.6 percent), and 46 Catholics (43.4 percent). The workforce composition is reflective of the religious representation in the whole of Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic). The company is engaged in retailing toys. Considering the company's business type and the locations of its stores, the whole of Northern Ireland was deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: As of May 2007, Toys 'R' Us told MSCI that the company previously reached an agreement on implementation of the MacBride Principles in April 1999, but the companies that acquired Toys 'R' Us had not endorsed the principles.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of May 2007, the company told MSCI that neither community appeared uncomfortable contemplating employment at Toys 'R' Us' Belfast store but the store, which is located in a predominately Protestant neighborhood, could be off-putting to Catholics. Workers traveling from the city center to Newtownabbey passed through Unionist paramilitary murals. The EEO policy, however, ensured that Toys 'R' Us commits to the maintenance of a good and harmonious working environment in which no worker feels under threat or intimidated because of his/her religious belief or political opinion. Toys 'R' Us prohibited the display of flags, emblems, posters, graffiti, or the circulation of materials or the articulation of slogans or songs which were likely to give offense or cause apprehension among particular groups of employees. In addition, Toys 'R' Us issued a Sectarian Harassment at Work employee guide that defined sectarian harassment and outlined prevention measures and grievance procedures. The company conducted workshops on harassment and intimidation for all employees.

Grievances: As of December 2011, no complaints were filed against the company at the Fair Employment Tribunal (FET).

Wal-Mart Stores, Inc.

Operations in Northern Ireland:

Asda Stores Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	12/1/2006	Affirmative Action	No	FET Settlements	1

Asda Stores Ltd.

Location	14 locations across Northern Ireland
Business	Retail Supermarket
Employees	(Data as of 2011)
	Protestant 2310
	Catholic 2129
	Other 57
	<u>Total 4496</u>

2010 Survey Response: None

Available information: Asda has several locations throughout Northern Ireland and is considered to be one of the biggest employers in the province. Wal-Mart acquired Asda in 1999.

Compliance with Northern Ireland fair employment law and Code of Practice: In November 2009, Asda told MSCI that it still maintained an equality policy. The Northern Ireland senior management, U.K. management, and corporate headquarters continued to oversee the company's equality policy in Northern Ireland.

In its past survey responses, Asda provided comprehensive information on its policies and procedures regarding harassment, hiring and selection and EEO issues. The policies adhered to the standards established in the Code of Practice. Asda has won several awards for its positive work environment, including "best place to work awards" from Fortune Magazine, and The Sunday Times newspaper. Asda's statement on equal opportunities attached to its survey response maintained that the company aimed to actively promote fair treatment and opportunity from the recruitment and selection to training and promotion. It consulted with its workers' trade union (the USDAW) on a monthly basis, and it used a software package recommended by the Equality Commission to monitor its work force. All employees were regularly briefed about the EEO policies.

Asda also said that it notified all employees of job opportunities. The company publicly advertised available positions through the Belfast Telegraph, the Irish News, the Newsletter, other regional newspapers, job markets and the company intranet. Asda typically promoted from within for managerial positions. To select candidates, the company used an interview panel comprised of employees who have received EEO training. It attempted to ensure both communities were represented on panels. However, the company acknowledged that this was not always possible.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Asda Store's operations in Northern Ireland. According to the 2010 Equality Commission Monitoring Report, Asda Store's workforce consisted of 2,310 Protestants (52 percent), and 2,129 Catholics (48 percent). Both communities were also fairly represented in the new hires. The company reported having hired 571 Protestants (54.2 percent) and 482 Catholics (45.8 percent). The workforce composition was reflective of the religious representation in the entire province of Northern Ireland (57.3 percent Protestants, 42.7 percent Catholics), the most appropriate catchment area since the company maintained numerous locations throughout the province.

Conformance with MacBride principles: In 2009, Asda told MSCI continued to be compliant with the MacBride Principles.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, the company had several locations in Northern Ireland. This should not pose any overall chill factor to either community.

Grievances: As of December 2011, there were no active complaints against Asda Stores at the Fair Employment Tribunal. In April 2011, one complaint was filed against the company. This was settled in September 2011. In November 2009, Asda told MSCI that it continued to be committed to maintaining a workplace that is free of harassment. Harassment based on religion or political opinion can be reported by filing a complaint confidentially to someone other than the direct supervisor.

Watson Pharmaceuticals, Inc.

Operations in Northern Ireland:

Nicobrand Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	1/1/2002	Affirmative Action	Unknown	FET Settlements	0

Nicobrand Ltd.

Location	Coleraine
Business	Bulk chemical processing
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Nicobrand operates in a 10,000 square foot bulk chemical processing facility in Coleraine.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2008, Nicobrand told MSCI that its senior managers in Northern Ireland continued to oversee equality policies. The company added that it publicly advertised all job openings through local and regional newspapers. When selecting candidates, the company used an interview panel comprised of members of both communities who have received EEO training.

Underrepresentation analysis: Nicobrand appeared in the 2011 Register of Employers but was missing in the 2010 Monitoring Report, meaning that the company most likely had between 11 to 25 employees. MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: In 2008, Nicobrand told MSCI that its policies continued to comply with the MacBride Principles. The company reached a MacBride implementation agreement

in 2002. This prompted New York City pension funds to withdraw a shareholder resolution on the subject.

Affirmative action outreach: As of December 2011, it was unclear whether Nicobrand had affirmative action programs in place.

Chill factor and neutral workplace: As of December 2011, the Northern Ireland Service did not find any outstanding chill factor concerns at Nicobrand. Members of both communities should feel comfortable and secure in Coleraine, which is a relatively mixed area in terms religious composition.

Grievances: No complaints have been filed against the company at the Fair Employment Tribunal as of December 2011.

Yum! Brands, Inc.

Operations in Northern Ireland:

Herbel Restaurants

Restaurant Management Services Ltd.

MacBride Agreement	No	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	No	FET Settlements	0

Herbel Restaurants

Location	Belfast
Business	KFC fast-food restaurants
Employees	(Data as of 2011)
	Protestant 83
	Catholic 44
	Other 140
	Total 267

2010 Survey Response: None

Available information: Yum Brands has declined to respond to the Northern Ireland Service fair employment survey and said that its franchisees follow Northern Ireland fair employment law. The company said in its 2007 proxy statement that its franchise businesses in the region were already required by law to adhere to the Fair Employment & Treatment (NI) Order 1998, and the company felt that it was not necessary for it to force its franchisees to adopt similar but not identical fair employment guidelines that overlap with the existing laws of Northern Ireland.

In 2002, the Northern Ireland Service conducted interviews about Kentucky Fried Chicken outlets in the province and its fair employment issues. Equality Commission staff in Belfast has said that Herbel Restaurants has taken some actions to reform its fair employment practices. KFC opened its

first U.K. outlet in 1965. Since 2000, it has been expanding rapidly, with more than 500 outlets in England, Scotland and Northern Ireland.

Herbel Restaurants, holds the Northern Ireland KFC franchise. Significant unanswered questions exist about fair employment matters at Yum Brands' operations in Northern Ireland, years after a sectarian loyalist mural was removed from one of the KFC outlets in north Belfast. Death threats against Catholics working at two other KFC outlets also were reported in 2002. Several Belfast sources indicated that the mural, on the lower Shankill Road just outside central Belfast, was painted because of internecine feuding between different loyalist groups about territory and control of illicit business in the area, a turf battle that was later resolved at least for the time being. The location is one where Catholic would never work or visit, next to a treeless brick housing estate—one of Belfast's most intimidating neighborhoods. A Yum Brands official said that "political statements" such as the mural are unacceptable to it and requested the franchisee to remove the painting; the mural disappeared two days later in the middle of the night.

Compliance with Northern Ireland fair employment law and Code of Practice: Yum Brands provided no information about the fair employment policies of Herbel Restaurants. A separate inquiry directed to Herbel Restaurants also elicited no response. The loyalist paramilitary mural on the Shankill Road KFC outlet in Belfast was a clear violation of the neutral workplace provisions of Northern Ireland's fair employment law. But nobody filed a formal complaint about it and the Equality Commission itself found the issue too sensitive to broach.

Underrepresentation analysis: As of February 2011, both communities were fairly represented at Herbel Restaurant's operations in Northern Ireland. According to the monitoring report, Herbel Restaurant's workforce consisted of 83 Protestants (65.4 percent), and 44 Catholics (34.6 percent). The workforce composition is reflective of the religious representation in Belfast. The company is engaged in fast food retailing. This mostly requires low skilled workers, who are most likely to come from nearby areas. As a result, Belfast is deemed the most appropriate catchment area or point of comparison.

Conformance with MacBride principles: A shareholder resolution asking for MacBride implementation at Yum Brands has been voted on annually by the company's shareholders since 2003, usually receiving double-digit support. However, the proposal only received 9.2 percent support in 2008, leaving it ineligible for resubmission until 2011. Yum Brands has regularly opposed the proposal, saying that the MacBride Principles were superseded by Northern Ireland's fair employment law. As a result, it cannot force Herbel Restaurants to comply with the principles because it cannot obligate the company under Northern Ireland law.

Affirmative action outreach: As of December 2011, affirmative action measures did not appear to be necessary at the company's operations in Northern Ireland.

Chill factor and neutral workplace: The paramilitary mural on the side of the Shankill Road KFC was a clear violation of the MacBride Principles. A very substantial chill factor exists for Catholics at some KFC locations in Northern Ireland. Catholics working at two KFCs, in East Belfast and in Antrim, northwest of Belfast, were reported to have received death threats from loyalist paramilitary groups in the early years of the last decade. Also, news reports indicate a victim was knocked to the ground outside the KFC in Belfast's Bradbury Place on March 29, 2004. Nonetheless, given the overall employee composition of Herbel Restaurants, it is clear that not all KFC outlets present a chill factor to Catholics. In contrast to many industrial locations, the workers at fast food restaurants are quite vulnerable, given the late hours the franchises are open, their relative youth, and the relatively few

staff on duty. Ensuring that they are protected while at work is a significant challenge, yet one that is clearly the company's obligation under Northern Ireland law.

Grievances: As of December 2011, no claims were filed against the company at the Fair Employment Tribunal.

Restaurant Management Services Ltd.

Location	several locations in Northern Ireland
Business	Pizza
Employees	(Data as of 2011)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: Restaurant Management Services Ltd. Pizza Hut franchises in Northern Ireland. The company announced in 2009 that it would close 5 of its 14 locations in Northern Ireland. As of December 2011, no further updates were available.

Compliance with Northern Ireland fair employment law and Code of Practice: As of December 2011, no information was available regarding the company's fair employment policy policies and practices.

Underrepresentation analysis: Restaurant Management Services neither appeared in the 2011 Register of Employers nor in the 2010 Monitoring Report, meaning that the company most likely had 10 employees or less.

MSCI's Northern Ireland Service does not make underrepresentation assessments when a company has 25 employees or less.

Conformance with MacBride principles: Yum Brands has regularly received shareholder resolutions regarding the MacBride Principles, though the resolutions have all focused on KFC franchises, rather than Pizza Hut.

Affirmative action outreach: As of December 2011, it was unclear whether the company had affirmative action measures in place at its operations in Northern Ireland.

Chill factor and neutral workplace: As of December 2011, it was unclear whether Restaurant Management Services' employees faced chill factor in Northern Ireland.

Grievances: As of December 2011, no complaints were filed against affiliate at the FET.

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