

2005

Annual Report (298)

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IRRRC

**Report on New Jersey
Portfolio Companies
in Northern Ireland**

Submitted to the Department of the Treasury, State of New Jersey

December 2005

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New Jersey Portfolio Companies in Northern Ireland

Company Profiles

The attached company profiles include information relevant to the nine MacBride principles. The principles are cited in New Jersey P.L. 1987, Chapter 177 in their unamplified form, as follows:

- A. Increasing the representation of individuals from underrepresented religious groups in the work force including managerial, supervisory, administrative, clerical and technical jobs.
- B. Adequate security for the protection of minority employees both at the workplace and while traveling to and from work.
- C. The banning of provocative religious or political emblems from the workplace.
- D. All job openings should be publicly advertised and special recruitment efforts should be made to attract applicants from underrepresented religious groups.
- E. Layoff, recall and termination procedures should not in practice favor particular religious groupings.
- F. The abolition of job reservations, apprenticeship restrictions, and differential employment criteria, which discriminate on the basis of religion or ethnic origin.
- G. 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.
- H. The establishment of procedures to assess, identify and actively recruit minority employees with potential for further advancement.
- I. 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.

Each company entry starts with an overview of key fair employment facts that relate to all the parent company's operations in Northern Ireland:

- whether the company has an agreement on implementation of the MacBride principles,
- if any of the operations in Northern Ireland have an underrepresentation of Catholics or Protestants and if 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 lawfully can 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 is stated, along with the percentage of equity held by the parent firm if less than 100 percent, the location, business line, 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 when the total employee count exceeds 50; conclusions drawn from proportional breakdowns below 50 are generally questionable. Subheadings in the remainder of each profile indicate:

- the extent of the company's response to IRRC's 2004 survey;
- the quality and source of information available;
- compliance with Northern Ireland's fair employment law and *Code of Practice* (the Fair Employment and Treatment (Northern Ireland) Order 1998, is an act of the British parliament and the detailed *Code* is authorized by the British government and spells out legal requirements and makes recommendations to employers for best practice in this area);

- whether Catholics and Protestants appear to be fairly represented;
- the company's position on the MacBride principles;
- any affirmative action the company is taking;
- the existence of any chill factor and any steps taken to ensure a neutral workplace; and
- any discrimination complaints filed against the company at the Fair Employment Tribunal.

The profiles refer to three government agencies in Northern Ireland:

- the Equality Commission for Northern Ireland, which replaced the Fair Employment Commission (FEC) in October 1999;
- the Fair Employment Tribunal (FET), the judicial body that adjudicates complaints filed under fair employment law in Northern Ireland; and
- InvestNI, the Northern Ireland government investment promotion agency.

Data on the religious makeup of each work force is generally reported as of February each year. Information on 2004 employee data in the profiles therefore refers to the 12-month period ending in February 2004, unless otherwise noted.

* * *

As in 2004, this report includes information on U.S. firms with non-equity ties to Northern Ireland. Four of the companies profiled—ChevronTexaco, ExxonMobil, Marriott International and Yum Brands—have franchise or franchise-like ties to business in Northern Ireland. The other firms profiled have equity ties to the Northern Ireland companies described, and own at least 10 percent of the firms in question.

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3M

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	5/96	Affirmative Action	yes	FET Settlements 0

- 3M Industrial Tapes**

Location	Bangor, Co. Down		
Business	adhesive tapes		
Fair Representation	Catholics appear to be significantly underrepresented.		
Employees	(Data as of Feb. 2005)		
	Protestant	138	[87.9%]
	Catholic	19	[12.1%]
	Other	4	
	Total	161	

2005 Survey Response: full

Available information: 3M company manufactures adhesive tape at its Bangor location in County Down. It has cooperated with IRRC, completing surveys and providing IRRC with access to local managers for interviews several times. Company officials also have periodically met with IRRC in the United States since 1997.

In 2004, the company took part in a training program partially funded by InvestNI, which it said helped boost profitability to its best level in recent years. The size of 3M's work force shrank about 6 percent a year from 1996 and 2003, cutting a third of its original Northern Ireland work force. 3M has added 11 positions since 2003.

Compliance with NI fair employment law and Code of Practice: 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 reports 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 that is somewhat unusual compared to other U.S. firms in Northern Ireland.

Underrepresentation analysis: For the second consecutive year, 3M's work force grew slightly, but Catholic representation has dropped a little. Catholics appear to be underrepresented overall at the company and specifically among plant and machine operatives, who comprise about seven percent of the work force. Catholics have appeared slightly underrepresented for the last couple years, but no definitive conclusion can be drawn since one additional Catholic employee would change this assessment. The company is located in a predominately Protestant area and less than 10 percent of applicants in the most recent monitoring period were Catholics.

The company has not made anyone redundant since 2003. Redundancies have been most prevalent in the plant and machine operative category, although in 2003 they hit all the company's other job categories, as well. Employment changes in the late 1990s resulted in a slight upward trend in the Catholic proportion of the work force hitting a high in 1999 of 14 percent. IRRC's analysis assumes that all of Northern Ireland is the appropriate catchment area for management, professional and sales jobs, and that the Belfast travel-to-work area is appropriate for associate professional, technical and skilled positions. North Down is used as the catchment area for the largest employee category--plant and machine operatives. Nearly all of the company's employees come from the nearby North Down and Ards areas, which are heavily Protestant.

3M's affirmative action agreement with the Equality Commission 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 proportion of its manual work force to 11 percent. 3M met these goals and generally has exceeded its target for Catholic applicants, but in 2005 less than 6 percent of applicants identified their religion as Catholic. Catholic applicant levels were higher in the late 1990s, but the company told IRRC vacancies in those years were for highly paid, skilled positions for which candidates would be willing to travel, attracting applicants from areas

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with more Catholics than its immediate vicinity. Plant and machine operatives account for nearly 70 percent of the company's work force and in the last year there were 63 applicants for eight opening at this level. New hires were very heavily Protestant.

The company does not use a last-in, first-out redundancy policy, which can affect one community disproportionately, but bases redundancies on merit or asks for volunteers.

Conformance with MacBride principles: The company reached an agreement with shareholder activists on implementation of the MacBride principles in 1996. It says local managers implement this commitment as "it is a condition of employment to abide by our equal opportunities policy" on fair employment, which is a "key area of responsibility" in managerial job descriptions. "Failure on this responsibility will be treated seriously by the company and corrective action taken." 3M says the company has agreed to complete IRRC's annual survey and has done so for the last nine years.

Affirmative action outreach - The company reported in 2003 that negotiations were underway on affirmative action. Previously, in 1997, the company developed an outreach program that includes links with schools, colleges and charities, church liaisons, cultural and community events and corporate Earthwatch, an international science and educational charity. The company also started placing ads in the *Irish News* and the *Sunday Life*, in addition to the *Belfast Telegraph*. It began welcoming both communities to apply in 1996. The schools outreach program includes "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 in the past 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 has included sponsoring teams of the Catholic Gaelic Athletic Association. In early 2004, the company noted that some of its outreach initiatives have been scaled back, but that it still supports "a range of activities in the minority community...including work placement weeks and art competitions."

Chill factor and neutral workplace -The company has banned the wearing of football soccer shirts in the plant; allegiance to certain teams in Northern Ireland can be extremely sectarian. It also prohibits 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, and no problems appear to have surfaced with this neutral workplace policy. All employees receive specific training on sectarian harassment in the workplace. Workers have not reported experiencing intimidation or harassment of a religious or political nature in any of 3M's exit surveys, the company says. The company 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 provides employees who have a religious or political grievance with access to a member of staff who is co-religionist and initiates the company's disciplinary procedure, if the facts warrant it. Managers note that the average tenure at the facility is 15 years. As a result, they say, coworkers know each other well and the atmosphere is relaxed. The company reviews its harassment policy periodically with employees as a preventative measure, but no employee has ever used the complaints procedure.

Grievances -IRRC is not aware of any complaints filed against the company at the Fair Employment Tribunal.

Abbott Laboratories

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	6/01	Affirmative Action	not applicable	FET Settlements 0

• Abbott Laboratories

Location	employees work from home		
Business	pharmaceutical, health care and diagnostic products and services		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of Nov. 2004)		
	Protestant	3	
	Catholic	3	
	Other	5	
	Total	11	

2005 Survey Response: full

Available information: Abbott Laboratories regularly responds to IRRC's surveys and did so again in 2005. Employment grew from only seven workers to 16 in 2002, before dropping to the present level of 11; all still work from home. The Northern Ireland employees report to a head office in England.

Compliance with NI fair employment law and Code of Practice: The company has a worldwide code of conduct that "is rigorously enforced," a company representative told IRRC. The code includes sections on equal employment and workplace harassment, and specifically indicates that the company will not discriminate based on a range of characteristics, including religion and nationality. The company's description of its Northern Ireland EEO policy indicates that the policy complies with local requirements; the policy is overseen by a Abbott human resources manager based in England. The company says that "there is no question of any discrimination on grounds of religion."

Underrepresentation analysis: No group appears to be underrepresented at the company.

Conformance with MacBride principles: The company says its employees "have a great deal of independence" as they work from their homes, and has concluded that "the MacBride principles would be difficult to apply." The company says its policies reflect the fair employment standards embodied in the MacBride principles, and said it is willing to respond in full to IRRC's annual survey. It therefore meets the conditions of MacBride implementation agreements.

Affirmative action outreach - No affirmative action measure are indicated given the present work force breakdown. Still, the company reports that all managers are trained on employment law and specifically on discrimination and harassment.

Chill factor and neutral workplace -Abbott trains its sales team in personal safety, but since employees work from home and use company-owned cars for travel it says its employees "are not exposed to the security risks involved in using public transport to travel, to and from work." The company's code of conduct specifically prohibits "written or graphic material that denigrates or shows hostility or aversion to an individual because of their status and that is placed on walls, bulletin boards, in electronic media or anywhere else in the work environment or is circulated in the work environment," although Abbott notes that it has no company-owned workplace in Northern Ireland.

Grievances -The company reports that an former employee filed a complaint with the Fair Employment Tribunal for wrongful selection for redundancy in November 2004. The case remains pending and a company representative said she "firmly believe the case is unfounded."

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AES

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings	0
Agreement Date	4/96	Affirmative Action	yes	FET Settlements	1

• **AES Kilroot Power** (92% owned)

Location	Carrickfergus
Business	electricity generation
Fair Representation	Catholics appear to be significantly underrepresented.
Employees	(Data as of May 2005)
	Protestant 77 [85.5%]
	Catholic 13 [14.4%]
	Other 1
	Total 91

2005 Survey Response: full

Available information: AES owns more than 97 percent of AES Kilroot Power Ltd., with employees owning the rest. The coal-burning Kilroot Power station has come under fire in 2004 and 2005 for its intention to install air cleaning equipment. Environmental groups say Kilroot should close rather than look to expand the operational life of the plant. The Northern Ireland Authority for Energy Regulation also voiced opposition to the investment out of concern for ratepayers, who will likely pick up the £40 million price tag.

In May 2000, AES acquired Tractebel's stake in Nigen Ltd., a Northern Ireland entity whose shares were formerly equally split by AES and Tractebel. The acquisition netted AES additional holdings in Kilroot Power and a second facility, Belfast West Power. Kilroot Power now operates as a unit of AES (NI) Ltd., which is wholly owned by U.S.-based AES. Belfast West ceased generating electricity in April 2002 when AES was unable to secure new contracts for the aging plant, and decommissioning of the facility was finished in March 2004. The company has responded to IRRC's surveys every year since 1997, except in 2003; management met with IRRC in the early 1990s.

Compliance with NI fair employment law and Code of Practice: The company generally appears to adhere to recommendations of the Code, including affirmative action outreach measures that the Code encourages where there is underrepresentation. The company uses systematic hiring and selection procedures and manages an equal opportunities program.

Employee team leaders manage fair employment issues, although there is a monitoring officer who also assists the new team leaders with outreach and social responsibility projects. AES reports that all team leaders have had EEO awareness training and will be kept up to date with current legislation; the team leaders are responsible for recruitment, selection, training and performance reviews.

AES does not publicly advertise all openings, citing the continual downsizing of its work force. Its work force has about 76 fewer employees than in 2000. When it advertises openings, the company uses all three Belfast newspapers, ensuring widespread notice of job vacancies.

The company's Northern Ireland board of directors and senior management at the two power stations issued an open letter in 1995 "to the people of Nigen and Northern Ireland" stating their support for fair employment practices and policies. The letter was posted on the company's notice board and published in its newsletter. The company meets regularly with the Equality Commission.

Underrepresentation analysis: Managers accept that Catholics are underrepresented. Catholics appeared to be underrepresented overall at Kilroot and among associate professionals, who account for nearly 85 percent of the work force. The Catholic portion of employees with identified religion rose from 13.4 percent in 2002 to 14.8 percent in 2005. The number of Catholics employed remained constant at 13, but seven fewer Protestants work for AES in Northern Ireland than in 2004, boosting the Catholic share of the work force. The company reported

no redundancies, applicants or new hires in 2005. **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 - The AES plants have used positive actions encouraged by Northern Ireland's fair employment law and the Equality Commission to reach out to the Catholic community. In 1993, the company became one of the first major companies with underrepresentation to include a welcoming statement in its recruitment advertisements. The company is not currently doing any recruiting, however. In previous years, Kilroot also had an apprenticeship training program that had seen a steadily rising percentage of Catholic applicants. AES attributed the rise to increased outreach to schools and communities; the outreach program emphasizes Catholic schools.

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 in 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 that 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.

Grievances -One complaint has been filed against the company since 2000. The male employee withdrew the complaint in July 2001 after an agreement was settled between the parties.

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Alberto-Culver

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	10/05	Affirmative Action	not applicable	FET Settlements 0

- **Sally Hair & Beauty Supplies**

Location	seven locations around the province		
Business	beauty shops		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of 2003)		
	Protestant	14	
	Catholic	16	
	Other	1	
	Total	31	

2005 Survey Response: promised, but not received in time for this report

Available information: Alberto-Culver manufactures and sells beauty supplies through its subsidiary, Sally Hair & Beauty Supplies. The company has seven Sally retail stores throughout Northern Ireland, including in Belfast (two locations), Newtownabbey, Portadown, Newry, Coleraine and Ballymena. The Equality Commission indicates that the company had 31 employees in 2003, 16 of whom were Protestants. The company has not responded to any IRRC inquiries, but in October 2005 agreed to provide more information on its operations given an agreement it reached on MacBride implementation with the New York City Comptroller's office.

In related news, Sally Hair & Beauty signed a deal with Bangor-based Denman International in September 2004 projected to result in new business for Denman of more than £1 million. Denman is to supply a range of branded hairbrushes and combs for distribution through Sally's global network.

Compliance with NI fair employment law and Code of Practice: No information is available on the company's fair employment policies and practices.

Underrepresentation analysis: Neither community appears to be underrepresented when the company's work force is compared to the working age population in Northern Ireland as a whole, the best comparison given the company's locations around the province.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation in late 2005 and has promised to provide information on its policies and work force to IRRC, but did not do so in time for inclusion in this report.

Affirmative action outreach - No affirmative action appears warranted.

Chill factor and neutral workplace -IRRC has no specific information about sectarian problems at any of the company's stores around Northern Ireland.

Grievances -Two discrimination cases filed by one woman in 2000 were conciliated at the Fair Employment Tribunal in March 2003.

Alcoa

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	yes	FET Settlements	0

- Aluminium Supply Aerospace**

Location	Newtownards	
Business	metal supplies	
Fair Representation	Catholics appear to be significantly underrepresented.	
Employees	(Data as of April 2005)	
	Protestant	
	Catholic	0-9
	Other	
	<hr/> Total	<hr/> 25

2005 Survey Response: full

Available information: For several years, Alcoa has provided a complete survey response for Aluminium Supply Aerospace (ASA), a division of as subsidiary, British Aluminium Ltd. Alcoa closed the operations it acquired from Reynolds Metals in Northern Ireland in 2002.

Compliance with NI fair employment law and Code of Practice: The company has described its equal opportunity policies in IRRC's surveys, and has provided a copy of its policies. ASA publicly advertises all openings and informs all employees about vacancies. It uses the *Belfast Telegraph*, the Internet, government-run job markets and company notice boards to fill positions. ASA uses panels, not individual interviewers, for candidate selection and reviews the religious composition of applicant pools to determine success rates by community. In its 2003 response, the company stated that it now has "cross-community representation where possible" although the data provided by the company show it has very few Catholic employees. The human resources team in Northern Ireland has delivered equal opportunity training to all employees, including personnel involved in job candidate selection. The company notes that the human resources manager and the general manager are responsible for fair employment matters in Northern Ireland.

Underrepresentation analysis: The company appears to have a clear affirmative action responsibility to boost the Catholic portion of its work force. IRRC estimates that to be fairly representative of reasonable catchment areas for the plant, the company should employ at least four Catholics, reflecting a weighted catchment area that is 31.7 percent Catholic according to 2001 Northern Ireland census data. IRRC estimates that all of Northern Ireland is the recruitment area for managers and sales people (eight of the workers with identified religion), while a narrower area including North Down, Castlereagh and Ards district council areas is most appropriate for clerical staff and plant and machine operatives (17 employees). The company notes that it considers an appropriate catchment area to be 12 percent Catholic. Ninety percent of its employees come from the North Down and Ards district councils; the remaining 10 percent reside in Castlereagh, a heavily Protestant suburb east of Belfast. The company may have to go further afield to attract more Catholic workers. Ninety-one percent of the applicants in the most recent monitoring period were Protestants, and new hires were heavily Protestant.

Conformance with MacBride principles: Alcoa, which has a MacBride agreement, says that it is compliant with the principles and it has responded to IRRC surveys.

Affirmative action outreach - Despite a clear obligation to conduct affirmative action, given its work force composition, the company at present has no affirmative action plan and has set no goals and timetables to work towards ensuring fairer participation by Catholics. ASA commented that it is aware of its responsibility and "regularly review and train on all procedures to ensure equality of opportunity at each stage of the recruitment process," said company staff. It has taken steps to include an EEO statement in its employment ads and uses job markets in presumably predominantly Catholic areas. However, the company told IRRC, "we also feel that there should be recognition of the limitations for corrective action." The department manager facilitates all training for

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exercises for staff and employees can "express their own training needs" in performance reviews. The company commented, "we are reaching all parts of the community to give equal opportunity to all on awareness of vacancies within our industry thus encouraging a relevant percentage ratio of applicants to all vacancies." Nevertheless, fewer than 9 percent of applicants with identified religion were Catholics in the most recent monitoring period.

Chill factor and neutral workplace -The company appears to have taken efforts to ensure employees are safe at work and while coming and going from work. It has premises with secure car parking, which all workers use, and has requested the roads service to improve road signs for general safety. The company reports that all employees have received training on its grievance procedure and harassment policy. Its introduction program for new employees includes equality training.

Grievances -ASA provided IRRRC with copies of its updated grievance and disciplinary policies in 2003 that comply with U.K. law and specifically address Northern Ireland fair employment legislation. In 2004, the company reported that employees could now make confidential complaints on its ethics and compliance phone line. IRRRC is not aware of any grievances filed against the company at the Fair Employment Tribunal.

Allstate

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	maybe	FET Discrimination Findings 0
Agreement Date	11/00	Affirmative Action	unknown	FET Settlements 0

• Northbrook Technology of NI

Location	Belfast, Derry, Strabane		
Business	software support for Allstate		
Fair Representation	Protestants might be significantly underrepresented.		
Employees	(Data as of May 2005)		
	Protestant	504	[39.3%]
	Catholic	777	[60.7%]
	Other	163	
	Total	1444	

2005 Survey Response: full

Available information: Northbrook Technology opened its Belfast facilities in 1999 and changed locations within Belfast in 2002. The company has grown substantially since its founding and currently employs 1,444 workers, including 1,281 company classified full-time employees. Company representatives are focused on "casting the net further" by recruiting workers from Poland and India because they believe there is a lack of skilled IT workers in Northern Ireland. Competition from Citibank has put a further squeeze on the shortage of labor. Employment has nearly doubled since 2004 because it opened a new facility in Strabane and added a new office to its facility on the Magee campus. (Northbrook refers to the latter site as Magee to avoid sectarian labels of Derry or Londonderry.) InvestNI contributed £5.5 million to the new Strabane location, which is slated to produce 260 jobs. The Strabane facility current employs 205 workers. The company has responded in full to IRRC's surveys since 2001, and has met with IRRC staff, most recently in 2005.

Compliance with NI fair employment law and Code of Practice: The company told IRRC that it adheres to the standards established by the Fair Employment and Treatment (Northern Ireland) Order 1998, and follows the recommendations and requirements of the Code of Practice. It appears to treat equality issues seriously and has developed strict formal processes for the recruitment and selection of employees. While the company has periodic recruitment drives, its human resources managers say that it is always interested in talented workers and therefore places constant recruitment ads in the newspapers. It uses the *Belfast Telegraph* for vacancies in both Belfast and Derry, and also uses the Derry Journal and the Donegal Democrat for positions in Derry. It also advertises on the Internet and in job markets. When recruiting for specific positions, Allstate first advertises internally if the position requires special knowledge, then places ads externally. An employee team reviews the resumes and creates a short list of candidates, who then must take an aptitude test to qualify for an interview. Selection panels always have cross-community representation. Northbrook trains all its interviewers on recruitment and selection techniques to ensure that all interviews have a consistent format and that no informal discussions arise that could introduce inappropriate information about a candidate. The company told IRRC that the shortage of skilled IT workers means that companies such as Northbrook "can't afford to have poor fair employment practices."

Northbrook provides diversity training for all its employees as well as training on Northern Ireland fair employment legislation. It borrows from Allstate's U.S. diversity training programs and adapts the material to a Northern Ireland-specific program. Line managers receive special training on equality and selection techniques, and the human resources team attends regular training sessions with the Equality Commission. The company's director of human resources previously spent ten years as a lawyer with the FEC, now the Equality Commission. Managers in Northern Ireland say that U.S. senior managers are knowledgeable about Northern Ireland equality issues and regularly visit the Belfast office.

Underrepresentation analysis: Protestants appear to be underrepresented at Northbrook when the work force is compared to site-specific catchment areas. Northbrook has three locations, one in the city center of Belfast and the other two in Strabane and Derry. It recruits workers for the Strabane and Derry offices from the local area as

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well as from the Republic of Ireland because both locations are in close proximity to the border. IRRC does not have a breakdown of job category for each site, but Northbrook did provide the size of the work force for each of its locations. When the entire work force is compared to the Belfast travel-to-work area and Northern Ireland as a whole for more skilled positions, Protestants are significantly underrepresented among professionals, associate professionals, administrative positions, sales and overall. Northbrook told IRRC that it considers all of Northern Ireland to be an appropriate catchment area for its workers in Belfast. Strabane and Derry figures also reflect significant underrepresentation, although both communities appear fairly represented in Derry when IRRC uses the district council area's unemployed population as the appropriate catchment area. This is a fair assessment because Northbrook recruits from the actively unemployed in Derry and Strabane. The company has gone so far as to conduct mock interviews and resume training to help applicants, some of whom are third generation unemployed, prepare for potential opportunities.

Protestants still appear significantly underrepresented when the work force in Strabane is compared to the unemployed figures for the local district council area. Nearly 80 percent of Northbrook's associate professionals are Catholics and this employment category is typically compared to all of Northern Ireland at 42.7 percent Catholic. Given that a trend of Protestant underrepresentation has been emerging in the last few years, it is noteworthy that Catholics accounted for more than 70 percent of the 548 new hires in the most recent monitoring period. Sixty-two percent of applicants to Northbrook were Catholics. Applicant and new hire figures in the last few years show an increase in the proportion of Protestants, but still have remained heavily Catholic. In 2004, 57.5 percent of 1,207 applicants with identified religion were Catholics, down a little from 60 percent of 1,024 in 2003. Catholics made up 53.5 percent of 346 new hires in 2004 and 56.2 percent of 249 new hires in 2003. The company told IRRC that it does not believe any group is underrepresented at its operations, noting that the Equality Commission has not raised any concerns about its annual monitoring return.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation in November 2000. Allstate told the New York City comptroller at the time, "We have and will continue to make all lawful efforts to conduct operations in Northern Ireland in accordance with applicable fair employment standards and practices, including those embodied in the MacBride principles." The company also said it would continue to cooperate with IRRC's monitoring process, which it has consistently done.

Affirmative action outreach - IRRC believes the company is obligated to try to attract more Protestant applicants. Northbrook disagrees, but it told IRRC in 2005 that the Equality Commission may ask it to take on an affirmative action plan in Strabane and maybe in Derry. The human resources manager in Derry has experience in affirmative action plans and Northbrook believes "she is well placed to administer a plan" should one be needed. It says "one might expect the representation at" its Strabane location to be "predominately Catholic and the organization has therefore entered into discussions with the Equality Commission to examine ways in which we can encourage a higher number of applicants from Protestants." It says it will report any plan specifics in its next survey response.

Managers told IRRC in 2001 that they focused on implementing fair, systematic recruitment processes to ensure that they maintain proportionate levels of representation.

The company participates in several outreach initiatives to train potential employees in local communities. One program aims to bring disadvantaged youth from south and east Belfast into employment, which could have the effect of boosting Protestant applicants. Northbrook has also won several awards for gender diversity and for investing in its employees.

Chill factor and neutral workplace -The company's office in Belfast is in a neutral area downtown that should pose no chill factor to members of either community. It is in a modern building near the Waterfront Hall and Odyssey Arena. Other nearby companies include Fujitsu and BT. The company's offices in Derry will be on the more heavily Catholic "cityside" of the River Foyle, which effectively divides the city between the two communities, so it is possible Protestants contemplating traveling to work there might experience some chill factor. The site itself, however, is on the Magee campus of Ulster University, which is a neutral environment. Protestants may also be dissuaded from seeking employment at Northbrook's Strabane location, which is a predominately Catholic area.

Grievances -IRRC is unaware of any complaints filed against the company at the Fair Employment Tribunal.

American International Group

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	9/04	Affirmative Action	not applicable	FET Settlements 0

• AIG Management (UK) Ltd.

Location	Belfast
Business	insurance
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of Dec. 2003)
	Protestant 8
	Catholic 8
	Other 2
	Total 18

2005 Survey Response: full

Available information: AIG opened offices in Belfast in March 2004; it ultimately expects to employ about 150 people, selling insurance throughout Northern Ireland. The company provided a complete response to IRRC's survey, providing information on its work force and fair employment policies, including a copy of its EEO policy. In addition to AIG Management, it also employs two people through its AIG Europe (UK) Ltd. operation, at the same location.

Compliance with NI fair employment law and Code of Practice: AIG says that it conforms to Northern Ireland's fair employment law. The company uses the *Belfast Telegraph*, local and regional newspapers, government job markets, and recruitment agencies to fill its job openings. It uses EEO statements in ads. During hiring and selection, set criteria are used to score candidates, with candidates for senior positions going through more extensive screening. The company says all involved in the interview process "have been made aware of our equal opportunities policy," and that it will review the composition of applicant pools and new hires to determine community success rates during its first triennial policy review. The company says promotion and training decisions are "on the basis of need" and relevance for the business. Managers within Northern Ireland have immediate responsibility for implementing the company's EEO policy, and they are "supported and monitored in this task by their (more senior) managers," AIG reports.

Underrepresentation analysis: No group appears to be underrepresented at the company when the work force is compared to the working age population of Northern Ireland as a whole. More than half of the applicants for employment at the company between September 2003 and July 2004 (35 out of 63) were classified as "other/undetermined," a figure that is unusually high. In some cases, companies have reported to IRRC that they have not tracked the community affiliation of applicants and new hires when hiring is conducted by agencies. Companies are required to ensure the religion of their applicants is monitored, even if they use recruitment agencies, however. AIG considers all of Northern Ireland as its recruitment area and this is reflected in the list of district council areas from which it draws employees.

Conformance with MacBride principles: The company affirmed in September 2004 that it is conforming with the MacBride principles and that it will cooperate with IRRC monitoring of its operations. AIG says it "will continue to closely monitor our employment practices in Northern Ireland and take the appropriate actions (e.g., training, instruction, etc) to ensure continued compliance" with the principles, about which it has informed its local managers.

Affirmative action outreach - No affirmative action appears warranted given the company's work force breakdown. The company says it will take "any appropriate lawful action for the recruitment and/or promotion of any underrepresented group" should one be identified during the course of its fair employment policy review.

Chill factor and neutral workplace - The company's offices are in downtown Belfast and should not pose a chill factor for either community. AIG says that it provides employees "every opportunity and encouragement" to

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raise issues of concern regarding unequal treatment, discrimination and security. It is seeking guidance from the Equality Commission and local employers' associations about training its staff on dealing with potential sectarian harassment and intimidation in the workplace.

Grievances -AIG has both a grievance policy and a harassment and bullying policy to deal with complaints relating to discrimination. It says that all complaints "are dealt with seriously, promptly and confidentially," and that breaching the policy is considered misconduct. Victimization "will result in disciplinary action and may warrant dismissal," it says. Complaints may be raised with managers or directly with the human resources director. No discrimination complaints have been filed against the company at the FET.

Aon Corp.

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	1991	Affirmative Action	yes	FET Settlements 0

- Aon McMillen**

Location	Belfast
Business	insurance broking/investment
Fair Representation	Catholics appear to be significantly underrepresented.
Employees	(Data as of Feb. 2005)
	Protestant 44 [89.7%]
	Catholic 5 [10.2%]
	Other 5
	Total 54

2005 Survey Response: full

Available information: Aon McMillen offers insurance broking and financial investment advice through its Belfast office. It responded in full to the IRRC survey in 2004 and 2005 after sporadic updates in 2001 and 2003 and a fairly detailed letter in 2000 about its fair employment policies. IRRC met with Aon McMillen in 2005. The company's work force has remained stable over the last eight years and company representatives told IRRC in 2005 that they do not expect much change in the work force going forward. The company's main source of revenue is insurance sales to commercial and corporate businesses; it also sells personal insurance to a much lesser extent.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to all fair employment standards established by Northern Ireland law, and it appears to follow many recommendations of the Code. Aon publicly advertises all openings and informs all employees about vacancies. It uses the *Belfast Telegraph*, *Irish News*, local and regional newspapers and government job markets to fill positions. Aon always uses interview panels with more than one interviewer, although both communities are not always represented on the panels. All employees involved in candidate selection have received training on equal employment issues, and the company sometimes reviews the religious composition of applicant pools. Senior management is responsible for fair employment matters in Northern Ireland.

Underrepresentation analysis: Catholics appear to be underrepresented in Aon's overall work force and among managers, associate professionals and technical workers. IRRC estimates that all of Northern Ireland is the recruitment area for managers (seven workers with identified religion), while the narrower Belfast travel-to-work area is most appropriate for associate professionals and technical workers (29 workers with identified religion) and clerical staff (13 workers with identified religion). The resulting weighted catchment area is 34.4 percent Catholic. In the most recent monitoring period ending in February 2005, eight of the 10 applicants were Protestants. Aon McMillen recently hired three new employees including one Protestant and one Catholic. This slight work force change has increased the representation of Catholics by about 2 percent, even though the company employs the same number of Catholics it did in 2004.

Aon McMillen told IRRC that it reports to its Dublin office and that operations in the Republic and Northern Ireland are run as one company. It says when all 300 employees of the firm, north and south, are taken together, Catholics make up about 70 percent of the work force. Aon also noted that its board of directors is drawn from both communities.

Conformance with MacBride principles: Alexander & Alexander, a predecessor firm, reached an implementation agreement on the MacBride principles in 1991, and Aon reported in 2004 that its policies still reflect the MacBride principles.

Affirmative action outreach - The company appears to have a responsibility under Northern Ireland's fair employment law and the MacBride principles to conduct affirmative action aimed at increasing the Catholic

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proportion of its work force. The company does not have an affirmative action agreement with the Equality Commission and has set no goals and timetables regarding Catholic employees, but it does include a welcoming statement to Catholics in its employment ads as part of an affirmative action effort. Given that it was only able to attract two Catholic applicants in 2005, it appears the company may need to step up its efforts to encourage them. The company says it has very little turn-over and most positions that become available require a specific skill set, which makes recruitment difficult. The Equality Commission has never met with the company or asked it to conduct affirmative action.

The company had hoped to increase the number of Catholics when it bought another company that is predominantly Catholic. Aon wrote in 2000 that it is "constantly planning on ways to expand our business in the north, as well as in the south of Ireland," and that it is "always on the lookout for some appropriate insurance enterprise to purchase. We believe that within the course of, at most two or three years, we shall have identified a brokerage firm in the North of Ireland which is predominantly owned and staffed by members of the Catholic community and that by means of a merger with this kind of firm we shall be able, faster than by any other means, to create the kind of balance in our work force in Belfast which all of us at Aon throughout Ireland wish to see."

As of 2005, however, Aon had not made arrangements to acquire another company.

Chill factor and neutral workplace -The company's office is in neutral downtown Belfast and should pose no chill factor for Catholics or Protestants. Company representatives told IRRC that they have never heard a sectarian comment in the workplace and that if such an event occurred, the offender would be quickly "out the door."

Grievances -The company reported that a female Protestant employee filed a sexual discrimination complaint against the company at the Fair Employment Tribunal in 2004. Aon McMillen believes the claimant intends to drop the case, which is currently pending.

AVX

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings	0
Agreement Date	2/98	Affirmative Action	no	FET Settlements	0

• **AVX**

Location	Coleraine				
Business	multilayer ceramic capacitor mfg.				
Fair Representation	Catholics appear to be significantly underrepresented.				
Employees	(Data as of Feb. 2005)				
	Protestant	420	[73.8%]		
	Catholic	149	[26.2%]		
	Other	28			
	<u>Total</u>	<u>597</u>			

2005 Survey Response: full

Available information: The company regularly responds in detail to IRRC surveys and IRRC staff have interviewed local officials in Northern Ireland three times, most recently in 1999. AVX also provided IRRC with copies of its triennial review required under Northern Ireland's fair employment law.

It had been one of the largest U.S. employers in Northern Ireland for several years, although its work force has shrunk considerably from a high point of 1,395 employees in 2001, and now stands at less than 600. AVX closed its small plant in Larne in April 2002, cutting 65 jobs, in addition to other redundancies. In its 2005 monitoring period 30 workers were made redundant. Market conditions have been responsible for the employment fluctuations.

Kyocera Corp., a publicly traded Japanese company, owns 70 percent of AVX stock, which is traded in the United States.

AVX told IRRC in 2000 that it saw the new political executive in Northern Ireland as "very positive for the business community," because it believed local politicians could better set out the strategy for Northern Ireland PLC" and actions needed to spur growth and support prosperity. It said businesses could help politicians by helping the economy to grow, "which will help bridge the inevitable gap of a community supported in large by state subsidies to a private enterprise economy."

Compliance with NI fair employment law and Code of Practice: AVX's equal opportunities policy appears to conform with the provisions of Northern Ireland's fair employment law. It calls for periodic review of selection procedures, staff development, publicizing the policy, and filing grievances. Specific responsibility for implementation of the policy is placed on managers, supervisors and other staff members who recruit and train employees, as well as those responsible for personnel matters. The group industrial relations manager is responsible for overseeing fair employment matters at the company. The trade union "is consulted fully and supports the company" in EEO matters, AVX says. The company has completed voluminous reports for its triennial reviews that it must submit to the Equality Commission. Managers have attended equality management workshops, and AVX says it provides workshops and training for all employees to address potential sectarian harassment and intimidation in the workplace.

Job advertisements, which include an EEO statement, appear to be placed widely, in the *Belfast Telegraph* as well as local and regional newspapers, and local job markets.

Hiring procedures appear to be systematic, with interview panels, representation from both communities and EEO training for staff involved in the process. AVX also tracks applicant success rates by religion to identify differential success rates. Further, the company says it undertakes its training and employee development programs "without reference to employees' perceived religious beliefs." Finally, there is no formal redundancy

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procedure in place at the company; AVX says it retains "those employees who are best suited to the company's requirements."

In 2002, the company told IRRRC that it views the impending consolidation of equality legislation "as a positive step and will encourage a more proactive approach to the management of all equality issues in the business community."

Underrepresentation analysis: Catholics appear to be underrepresented at the company overall and among professionals, skilled workers and plant and machine operatives. IRRRC compared the company's work force to two plausible weighted catchment areas. In the broader estimate, IRRRC compared managers, professionals, associate professionals and skilled employees to Northern Ireland's working age population (42.7 percent Catholic) and clerical, plant and machine operatives and elementary occupations to the Coleraine district council area (28.1 percent Catholic); this area, weighted by job category, is nearly 31 percent Catholic. A more localized estimate compares the top two categories to Northern Ireland, associate professionals and skilled workers to a local travel-to-work area encompassing Coleraine and the nearby district council areas of Ballymoney and Moyle (34.1 percent Catholic), and clerical, operatives and elementary occupations to Coleraine; this area is just under 30 percent Catholic. The apparent underrepresentation is most evident among professionals, where Catholics make up just five out of 25 employees, and in the large plant and machine operative category, which has 76 percent of the work force; Catholics account for just 25 percent of these workers.

Catholic representation at AVX has fallen from a high of 28 percent in 2001 to the present level of about 26 percent. The company estimates that about 70 percent of its employees come from the Coleraine district council area, which is 28 percent Catholic according to 2001 census data. Another 19 percent come from nearby Ballymoney, which is 32 percent Catholic.

The company hired three additional workers in the 2005 monitoring period, two Protestants and one Catholic. Of the 26 applicants with identified religion, 16 were Protestants. AVX also made 30 employees redundant in 2005; nearly 80 percent were Protestants.

Work force trends up to 2003 appeared to more than reflect the demographic change in the area, with Catholics making up a higher proportion of applicants and new hires than of employees overall, particularly among plant and machine operatives. In 2004, AVX did not hire any additional workers. Catholics accounted for 36 percent of 2003 applicants and 35 percent of new hires, but no overall underrepresentation showed up given the numbers involved. Catholics accounted for 30 percent of all applicants in 2002, compared with 34 percent in 2001 and 30 percent in 2000. They made up 36 percent of new hires in 2002, 34 percent in 2001 and 29 percent in 2000.

Conformance with MacBride principles: New York City Comptroller Alan Hevesi withdrew a 1998 shareholder resolution after the company agreed to implement the MacBride principles "as far as it is practical" without contravening Northern Ireland's fair employment laws.

Affirmative action outreach - AVX has said its work force fairly represents its catchment area and believes no affirmative action efforts are needed. Given the local demographic changes and the shift in work force representation, the company may want to reassess this view. The company said in 2002 that "We will continue to manage equality in our business, using as far as is possible the best practice guidelines as issued by the Equality Commission and continue to focus on improvement" with its recruitment procedures.

In 1999, the company reported it had hired 23 workers from the government's "New Deal" program aimed at bringing the long-term unemployed into the workplace. The company hired three people from the program in the 2000 monitoring period, but it is no longer participating in the program. In 2003 when the company last did any hiring, Catholics appeared to be overrepresented among applicants and new hires, but they appear fairly represented this year.

Chill factor and neutral workplace -In 1999, IRRRC staff noted pro-unionist red, white and blue stripes painted on the entrance sign posts of the Ballycastle Industrial Estate, where AVX's Coleraine plant is located. AVX, however, says it maintains a neutral workplace and sectarian harassment and intimidation in the workplace is "contrary to our employment rules" and would be dealt with under the company's disciplinary procedures. AVX and its trade unions are party to a Joint Declaration of Protection to ensure a neutral workplace free from

harassment. The company says it notifies all new employees of the company's policy on harassment, and that the Engineering Employers Federation has provided materials and coordinated workshops on harassment.

The company's policy says harassment "will not be condoned in any form and all complaints will be treated seriously." It provides for protection against victimization and retaliation directed at complainants. It also notes the company may dismiss employees who violate the policy. Employees are to maintain strict confidentiality during any investigation of a harassment allegation. Following the resolution of a complaint, the policy provides for consideration of employee transfers so the employees involved in the incident need not continue working together.

Grievances -Four complaints have been filed against the company at the FET since 2000. Three related FET claims from one man, filed in July and December 2003, were conciliated in January 2005. AVX said the complainant alleged discrimination after he was provisionally selected for redundancy. A complainant withdrew the fourth claim in 2003.

The company has formal and informal grievance procedures, which can include trade union assistance. Employees also may raise the matter "with a supervisor or manager of the employee's choosing" or a co-religionist.

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Baker Hughes

Type of Tie	equity			
MacBride Agreement	no	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	not applicable	Affirmative Action	yes	FET Settlements 0

• Hughes Christensen

Location	Belfast
Business	oil drilling equipment (rock bits)
Fair Representation	Catholics appear to be significantly underrepresented.
Employees	(Data as of June 2005)
	Protestant 259 [91.2%]
	Catholic 25 [8.8%]
	Other 5
	Total 289

2005 Survey Response: full

Available information: Baker Hughes, which entered the Northern Ireland market in 1954, was the first U.S. engineering company in the province. Hughes Christensen has consistently responded to IRRC surveys; IRRC has interviewed management on site in Northern Ireland three times and talked with shop stewards once.

Employment at the company has fluctuated with the fortunes of the oil industry as a whole; its most recent high point was 350 workers in 1998, while its most recent low point was 237 in 2000. It reached 336 workers in 2001 before falling back to the present level.

Compliance with NI fair employment law and Code of Practice: The company appears to adhere to many recommendations of the Code, particularly in its work force monitoring and hiring procedures. Hughes has provided training for supervisors and management on harassment, equal opportunity policy and discipline issues, on what it terms an "ongoing" basis. The company's equal employment opportunity policy, last updated in 2005, states its commitment to "equal employment opportunity in all employment-related practices." Hughes also reviews selection criteria on an ongoing basis, and personnel who hire employees also receive training on proper techniques, including equal employment. Selection panels also use cross-community representation "where possible."

The old Fair Employment Commission noted some years ago that the company had "carried out a thorough and comprehensive review that fully complies with the fair employment legislation," and said that a "considerable amount of work has been carried out on practices and procedures and affirmative action."

Underrepresentation analysis: Catholics are significantly underrepresented, and the location of the company poses a significant chill factor for Catholic employees. For its size, Baker Hughes has the lowest proportion of Catholics of any U.S. firm in Northern Ireland. Expansions and new investment at times over the years have had virtually no effect on Catholic representation; a recruitment drive and new investment in 1998 occurred at the same time that Catholic representation fell to its lowest point in years. Catholics did make slight gains at the company during the 2002 monitoring period, but their representation is still far short of that of the surrounding community. A catchment area weighted by job category, encompassing Belfast and Castlereagh, suggests the work force should be about 41 percent Catholic. The proportion of Catholics at Hughes Christensen hovered at around 7 to 8 percent between 1999 and 2001, then jumped to 9.9 percent in 2002 before dipping a little to 9.5 percent in 2003 and remaining steady at 9.6 percent in 2004. Catholic representation has dropped to 8.8 percent in the 2005 monitoring period because the company hired 19 additional employees, 18 of whom are Protestants.

Nearly all of the company's recent hires have been Protestants. Of the 109 workers hired between 2001 and 2003 with an identified religion, only 17 were Catholic (15.6 percent). Although this percentage appears small, it was a significant jump from Catholic representation among new hires between 1999 and 2001, of only about 10 percent.

In specific job categories, the underrepresentation of Catholics has expanded in the last year to include four of six categories of employment at the company: professionals, associate professional and technical workers, craft and skilled workers (one Catholic out of 20 workers) and machine operatives (13 Catholics out of 217 workers, or 6 percent). Operatives account for about three-quarters of the work force. In 2003, 36 operatives were made redundant, including five Catholics. No operatives were made redundant in the last two years.

Conformance with MacBride principles: The company has not reached an agreement on compliance with the MacBride principles, although it did have some discussions with MacBride advocates in spring 1998. It says that adopting the principles would make it "unnecessarily accountable to two sets of similar but not identical fair employment guidelines, the MacBride principles and the Fair Employment Act." Investors at the company considered shareholder resolutions asking for MacBride implementation from 1993 to 2003. In 2003, the proposal received only 6.4 percent support, down from a high of 23.7 percent in 2000; it is therefore not eligible for resubmission until 2007. The proposal had scored among the highest of any social policy resolution at all U.S. companies for a number of years. Despite not having a MacBride agreement, the company regularly responds to IRRC's survey and plans to continue to do so.

Affirmative action outreach - Hughes Christensen reports that the Equality Commission "has commented on the good work" that it and other local companies have done in their local outreach efforts as part of the Castlereagh Equality Forum. In 2004, the company's personnel manager made a presentation on the forum's work to other employers planning to take similar action elsewhere in Northern Ireland; she reports that the forum's work is seen as an example of "best practice." Hughes Christensen reached an affirmative action agreement with the old FEC in January 1997. The plan set a target of at least 15 percent for Catholic applicants and appointees for all posts for the 1998 monitoring year, at least 20 percent for 1999 and at least 25 percent for 2000. The company also agreed to an overall target for the work force of 25 percent Catholic over time.

Hughes previously met its 25 percent Catholic new hire goal in 2000 when it hired two Catholics and six Protestants, although Catholics made up a little less than 10 percent of applicants. It slipped away from this goal in 2001, despite hiring 87 people, as only eight (9.2 percent) were Catholics. In 2001, 58 of the 614 applicants were Catholics (9.4 percent). In 2002, the 19.3 percent Catholic representation level among applicants nearly met the company's 1999 goal. The percentage of Catholics among new hires also jumped dramatically to 40 percent in the 2002 monitoring period, although the company only hired 20 people during that period. In 2003, the number of Catholic applicants was 35.8 percent, but the company only hired two new workers. There were no applicants or new hires in 2004. Protestants accounted for the vast majority of new hires in the most recent monitoring period. Hughes says it is committed to an ongoing assessment of its progress toward affirmative action goals, and notes that its senior management team annually looks at fair employment issues "to ensure continuous improvement."

Outreach measures identified in the affirmative action agreement include ensuring that recruitment advertisements reach all communities and that job advertisements for hourly paid workers include a welcoming statement for the Catholic community. In addition, the company recruits through government training and employment agency offices and staff are encouraged to advertise vacancies through all offices in the relevant catchment area, including predominately Catholic West Belfast. The company also agreed in its FEC plan to maintain and develop new links with schools, training schemes, job clubs and influential leaders and organizations in the Catholic community. If the applicants' flow shows underrepresentation of any community, the company will consider how to develop additional links with the community. Hughes established further links with more schools in 1998 and 1999. In 2000, it placed ads in the Andersonstown News, a nationalist paper in West Belfast. In 2002, the company told IRRC that it also joins with other local employers to benchmark and share affirmative action strategies. Yet despite these ongoing efforts, further actions and a review of its hiring practices appear to be in order as Catholics continue to be significantly underrepresented in the work force.

Chill factor and neutral workplace -The location of Hughes Christensen's plant in Castlereagh poses a substantial chill factor to Catholics. Management says it provides security for workers on the job but not traveling to and from work. In searching for an explanation of the continued drop in Catholic representation before the 1999 monitoring period, Hughes Christensen's personnel manager noted to IRRC in 1998 that unemployment in Northern Ireland had dropped in the previous few years, and that there were more job opportunities in other area

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engineering companies, possibly providing opportunities to Catholics that are closer to home "or not in the center of a perceived Protestant area."

The company's religious and sexual harassment policy provides examples of physical, verbal and non-verbal harassment and outlines grievance procedures. The company's equal employment opportunity policy requires the plant to be free of graffiti, flags, bunting or any other displays of sectarian allegiance. The company has signed a joint Declaration of Protection with its trade unions.

In 2001, Hughes reported that it adopted a new harassment policy, which it provided to IRRRC. The policy gives a detailed description of what constitutes harassment and how employees may present complaints to the company. The ultimate sanction is dismissal.

Grievances -No fair employment grievances have been filed against the company in recent years.

Bemis

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	11/97	Affirmative Action	yes	FET Settlements 0

- **Perfecseal**

Location	Derry, Co. Londonderry		
Business	medical packaging		
Fair Representation	Protestants appear to be significantly underrepresented.		
Employees	(Data as of Feb. 2005)		
	Protestant	17	[10.2%]
	Catholic	149	[89.7%]
	Other	5	
	Total	171	

2005 Survey Response: full

Available information: The company has provided detailed information on its work force and fair employment policies and has consistently completed IRRC's annual survey since 1997. IRRC has met with Perfecseal's human resources administrator and also the director of finance, most recently in 2003. The company's work force dipped to 154 in 2002, down from a high of 181 in 2000 because of manufacturing efficiencies. It gained a handful of employees in 2003 and 2004 and although Perfecseal hired 25 employees in the last monitoring period, its work force decreased overall by two.

Compliance with NI fair employment law and Code of Practice: Company practices generally appear consistent with the Code of Practice. Perfecseal's updated equal opportunity policy in January 1998 places responsibility for successful application of the policy with management at all levels, endorses the merit principle, safeguards employees against any form of harassment and subjects employees to disciplinary action for failure to adhere to the policy. The general manager of the Northern Ireland facility has overall responsibility for equal employment.

The company advertises openings on the Internet, in local papers read by both communities, and in the *Belfast Telegraph* and the Sunday Independent of Dublin for some positions, using an EEO statement. Perfecseal always notifies all employees of positions open to internal applicants, and publicly advertises the majority of job openings, with the exception of jobs filled using recruitment agencies. It always uses a panel to interview job candidates, and both communities are represented where possible. The company provides all employees with equal opportunity training; some employees receive interview training.

Underrepresentation analysis: Protestants have been underrepresented at the company for a number of years when compared to plausible weighted catchment areas that consider different areas for varying job categories. IRRC considers all of Northern Ireland an appropriate catchment area for managerial, professional, and sales employees, the Londonderry travel-to-work area for associate professional and skilled workers and the Londonderry district council for clerical employees. In its analysis, IRRC compares two different catchment areas for plant and machine operatives, the district council of Londonderry and both the Londonderry and Limavady district council areas. Plant and machine operatives represent nearly half of the work force and Protestants appear to be clearly underrepresented when either of the two possible catchment areas is used. Protestants also appear to be specifically underrepresented among the miscellaneous job category and generally overall.

Perfecseal has grown rapidly in recent years and the somewhat high Catholic numbers may reflect the influence of the relatively larger number of Catholics among younger working-age people in Derry. Even so, Protestant underrepresentation persists in the plant and machine operatives job category and at the company overall when the large numbers of Catholics among young people are taken into account. The 2001 census data for youth showed a make-up of 72.3 percent Catholic for the Londonderry travel-to-work area and 75.9 percent for the Londonderry district council area. The skill level of the work force is increasing and entry-level requirements also

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are becoming more stringent, making it necessary for better qualifications that may not exist for all among this group of potential applicants. New employees ideally must have two years experience (though not necessarily recent experience) in a manufacturing environment and secondary school qualifications in math and English. The company also uses a psychometric test that can qualify applicants who do not have these qualifications.

Protestants have made up about 15 percent of applicants from 2000 through 2004, except in 2003 when their proportion dropped to 7.3 percent, and in the most recent monitoring period where Protestants accounted for just over 17 percent of applications. The company told IRRC that it attributed the dip in Protestant applicants in 2003 to the sharp increase of unemployed Catholics entering the job market after several textile plants closed in the area. Protestants appear to be underrepresented among applicants overall and in most job categories. Among new hires, they do not appear to be underrepresented in any specific job category, but they do appear to be underrepresented overall. Of the 24 people Perfecseal hired in 2005, three were Protestants. The company hired 19 employees in 2004, four of whom were Protestants. Of the six people hired in 2002 and 2003, most were Catholics.

The company last had redundancies in 2000, when it let go just two people. It has developed a redundancy matrix that includes a range of factors that consider skill, discipline records and other factors in redundancy selection.

Conformance with MacBride principles: Perfecseal says its operations adhere to the MacBride principles "where it is practicable and reasonable to do so." Bemis reached an agreement with shareholder proponents of the MacBride principles in 1997.

Affirmative action outreach - Perfecseal's affirmative action plan, adopted in 1998, includes specific goals for increasing the percentage of Protestant applicants and appointees to 17 percent in each year for manual grades. It also states "an overall (annual) goal of increasing the Protestant proportion of its work force to 28 percent."

Perfecseal reached its goal for Protestant applicants in the 2005 monitoring year as the percentage of applicants that are Protestants reached just over 17 percent, although new hires fell far short of the target, with just 12.5 percent Protestant representation. It clearly has some way to go before it meets the goal of 28 percent Protestant representation overall.

The company includes a general welcoming statement in all advertisements and a statement particularly welcoming applications from the Protestant community in advertisements for general attendant positions. Perfecseal advertises in the job market in Limavady, a nearby town that is more heavily Protestant than Derry, and is developing links with schools, job agencies, training schemes and community groups that serve the Protestant community. It also uses trade magazines to draw applicants. The company also has met with underrepresented community leaders to see what steps can be taken to attract applicants. In addition, Perfecseal reviews progress with its affirmative action plan at leadership team meetings and conducts an annual audit of employment issues.

The company told IRRC in 2003 that it has had difficulty recruiting employees on the Protestant side of the Foyle River because of inadequate public transportation. The facility has two shifts. The first shift starts before buses begin operating, and the second shift ends after public transportation closes. The company notes that most employees either walk to work or take cabs from the area surrounding the facility—which is heavily Catholic.

Chill factor and neutral workplace -Perfecseal reached a Joint Declaration of Protection with its union in 1996 and issued a policy that specifically addresses harassment. The union shop steward was consulted during development of the policy, which defines harassment, outlines both the complaints procedure, describes procedures for internal investigations, and discusses possible transfers after an investigation. Individuals may raise complaints with any member of management, usually with the human resources manager, and disciplinary penalties range from a verbal warning to summary dismissal. All employees have attended harassment awareness training sessions conducted by the Equality Commission. In addition, the Equality Commission has provided training for all managers and supervisors on the company's policies and procedures on discrimination, victimization and harassment.

The company is located in the Springtown Industrial Estate in Derry, which may be intimidating to some Protestants unwilling to cross the River Foyle to the predominantly Catholic side of the river.

Grievances -No fair employment grievances have been filed against the company in recent years.

Berkshire Hathaway

Type of Tie	equity			
MacBride Agreement	no	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	not applicable	Affirmative Action	unknown	FET Settlements 0

• Fruit of the Loom Manufacturing

Location	Derry, Co. Londonderry		
Business	yarn		
Fair Representation	Catholics appear to be significantly underrepresented.		
Employees	(Data as of 2003)		
	Protestant	80	[32.8%]
	Catholic	164	[67.2%]
	Other	12	
	Total	256	

2005 Survey Response: none

Available information: The company announced in September that over the next five years it will be shutting down its remaining two Irish plants and moving production to Morocco. The announcement, coming on the heels of a series of other textile closures that have cost the region some 6,000 jobs directly in the last five years, dismayed local officials and union members. Workers in Morocco will work for a fraction of the wages paid in Northern Ireland. The company cited competitive reasons for its decision. Layoffs are to begin in 2006.

Berkshire Hathaway provided no response to IRRIC's inquiries, but when Fruit of the Loom was still a publicly traded U.S. firm in its own right, IRRIC collected substantial information about its Northern Ireland operations and visited the facilities twice. Berkshire Hathaway acquired the company in May 2002, after it went bankrupt. From 1998 until the acquisition, the company was incorporated in the Cayman Islands, although it was still run from the United States, where it was publicly traded before the reincorporation. Information IRRIC has on file about the company's fair employment policies that appears in this profile is several years old, but is still probably fairly accurate.

The company has one Northern Ireland factory in the Londonderry district council area. Its Northern Ireland spinning mill in Campsie, northeast of Derry toward Limavady and perceived to be a neutral area, opened in 1991. In 1992, Fruit of the Loom started up a sewing plant at Templemore on the west side of the River Foyle, in a predominately Catholic area, which it closed in about 2000. The company also closed a major factory just over the border in Buncrana, Co. Donegal, in the Republic of Ireland, in the late 1990s.

Before the reincorporation to the Cayman Islands, IRRIC closely monitored the company along with other U.S.-based firms. Fruit of the Loom supplied data on its work force composition, fair employment practices and affirmative action measures recommended by the Fair Employment Commission. IRRIC interviewed the company's Northern Ireland managing director, plant manager and personnel manager at its Campsie site in 1995 and interviewed local managers and shop stewards in 1992.

Employment at the company dropped dramatically with the closure of the second Derry plant, and as of 2003 was down to only 256; the highest reported total employment for the company was in 1998, when there were 537 employees. A few hundred employees still work at the company's Co. Donegal plant in the Republic of Ireland, as well, for now.

Compliance with NI fair employment law and Code of Practice: Fruit of the Loom said in the past that it followed the recommendations as well as the requirements of the Code of Practice. Noting that its plants were "greenfield" start-up operations, the company said, "fair employment practices have been applied since day one to ensure that the work force has been selected without reference to religion." It appeared in the late 1990s that in general the Code was followed closely, including consultation with worker representatives on fair employment. The company outlined its equal opportunities policy and grievance procedure and disciplinary procedure in its employee handbook and displayed the policy in both plants' canteens and main entrances.

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Underrepresentation analysis: Catholics appear to be underrepresented at the company compared to several plausible catchment areas for the company as a whole. The Catholic proportion of the work force has dropped substantially with the closure of the second Derry plant in Templemore. As of 2003, Catholics accounted for 67 percent of the work force, up some from 66 percent in 2002 but still well below the more than 77 percent level of 2000 and a high of nearly 81 percent in 1998, when employment was at its zenith. Catholic underrepresentation exists when the work force is compared to the Derry district council area (73.6 percent Catholic) or young people in the Derry district council area (75.9 percent), although not when compared to the Derry travel-to-work area (67.2 percent).

When the company was operating its other site, now closed, in Derry, most of the employees for that plant lived in nearby housing estates that are almost 100 percent Catholic and Protestants appeared to be underrepresented. The present Campsie site is in a rural location that does not have any nearby large housing estates and is able to draw workers from a wider and more mixed area.

Conformance with MacBride principles: Fruit of the Loom had an agreement to implement the MacBride principles, but Berkshire Hathaway does not and has not responded to any inquiries.

Affirmative action outreach - When the company's work force appeared to have Protestant underrepresentation in the mid 1990s, the company and the Fair Employment Commission reached an affirmative action agreement. The company's efforts included EEO training for employees and monitoring of the policy's implementation, and included using a statement in ads that particularly welcomed Protestant applicants and using government training and employment agencies in Catholic areas, along with links with schools. Given the company's planned closure, it seems unlikely the company will attempt any special efforts to attract employees before its final closure in five years.

Chill factor and neutral workplace -The 1993 "Joint Declaration of Protection" promoted by the Irish Congress of Trade Unions and the Confederation of British Industry is incorporated into the employee handbook and displayed at both plants. With active support from its unions, the company apparently has taken a strong line on banning workplace sectarianism and in promoting cross-sectarian social activities.

Grievances -Two complaints filed against the company in 2000 and 2002 were withdrawn. One other grievance was dismissed in 2004, the complainant initially alleged discrimination on political/religious grounds. The religious discrimination component of the complaint was dismissed by the tribunal.

The company has a joint management-union grievance procedure that must begin with the direct supervisor concerned. The procedure as outlined in IRRC in the late 1990s did not appear to guarantee that a complainant could initiate a grievance with a co-religionist.

Caterpillar

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	maybe	FET Discrimination Findings 0.0
Agreement Date	2/02	Affirmative Action	yes	FET Settlements 2.0

• Wilson FG (Engineering)

Location	Larne, Newtownabbey, Belfast		
Business	manufacture of diesel generators		
Fair Representation	Catholics might be significantly underrepresented.		
Employees	(Data as of Feb. 2005)		
	Protestant	1617	[72.35%]
	Catholic	618	[27.65%]
	Other	78	
	Total	2313	

2005 Survey Response: full

Available information: Caterpillar has provided a full response to IRRC's survey since 2002. IRRC met with F.G. Wilson management in Northern Ireland in 2003.

F.G. Wilson continues to be the largest publicly held U.S. employer in Northern Ireland. Employment at the company dropped off slightly in 2005, after having risen steadily for several years; the company employs twice what it did ten years ago. F.G. Wilson has three sites--a main manufacturing facility in Larne and two smaller facilities in West Belfast and Newtownabbey. F.G. Wilson provided IRRC with a general idea of how many employees work at each site in 2003, and described how many employees come from each of Northern Ireland's 27 district council areas in 2005. 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. In June 2005, FG Wilson opened a new research facility at its Larne location, creating 29 skilled jobs. Invest NI chipped in £1.5 million towards the £6 million project. Plans for the new facility followed an announcement that the company added 170 permanent jobs to meet the increased demands for its exports.

Compliance with NI fair employment law and Code of Practice: The company has described its fair employment policies in its survey response and provided extensive supporting documentation. Its EEO policy has a comprehensive anti-discrimination statement and notes that to ensure its effectiveness, the company has consulted with employees about the policy and communicated its details to all workers. The procedures described in the policy appear to follow the requirements of Northern Ireland fair employment law and Code of Practice, and the recommendations of the Equality Commission.

As part of its affirmative action efforts, the company has developed a formal recruitment policy designed to be "systematic and objective." Caterpillar notes that all F.G. Wilson employees are notified of positions open to internal applicants and that it advertises external vacancies widely in Northern Ireland newspapers read by both communities. The company always uses an interview panel to select candidates, but does not always ensure both communities are represented on the panels, telling IRRC that to do so would be "impracticable and inappropriate." But all those involved in candidate selection have received EEO training. The company also always reviews the religious composition of applicant and new hire pools to determine success rates by community, which can be a useful check to ensure selection procedures are not biased. F.G. Wilson has agreed to a redundancy procedure with its unions that it says "provides for the application of measures that do not have a disproportionate effect on any one group, nor do they undermine affirmative action achievements."

The company clearly has made efforts to ensure good fair employment practices, some in conjunction with a Fair Employment Commission investigation of F.G. Wilson in the 1990s and other major employers with low numbers of Catholic or Protestant workers, but much subsequent to the commission's 1997 report, as well. There have been a number of complaints alleging F.G. Wilson discrimination filed at the Fair Employment Tribunal, however, although this is not unusual for a company of this size.

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The company's human services director, based in Northern Ireland, has direct responsibility for overseeing fair employment matters at F.G. Wilson. The company recognized trade unions at its facilities in September 2001, after being a non-union shop for many years, but it has not had any discussions with its trade unions on fair employment matters. F.G. Wilson has had some discussions with employee representatives about equal opportunities,

Underrepresentation analysis: The Catholic proportion of F.G. Wilson's work force has been at around 28 percent for the last five years, and is up from under 21 percent ten years ago. The company has made substantial progress towards a work force that is more representative of the local population and Catholic underrepresentation at the company has diminished considerably, although still exists under some catchment area assumptions.

IRRC considered all of Northern Ireland--42.7 percent Catholic as of 2001--as the appropriate recruitment area for managers, professionals, associate professionals and sales people. IRRC compared clerical staff, craft and skilled workers, plant and machine operatives and elementary occupations to the population in the three district council areas in which the company operates (Larne, Newtownabbey and Belfast) and two that are adjacent to these areas (Carrickfergus and Antrim); this area is 37.5 percent Catholic. When the work force is weighted by the number of employees in each job category and compared to these areas, the resulting "ideal" catchment area is 38.9 percent Catholic. When these comparisons are used, Catholics appear to be underrepresented in all but the tiny sales category, which has just four workers. This catchment area probably provides a good ballpark assessment of fair representation., and suggests more Catholic workers are needed to even out the work force.

But two alternative catchment areas can be defined; both are more heavily Protestant and in the narrower of these two areas, Catholic underrepresentation is minimal. The broader of these two considers for clerical staff, plant and machine operatives and "other" employees only the electoral wards in North Belfast instead of the Belfast district council area as a whole, plus Larne, Carrickfergus and Newtownabbey, the Belfast travel-to-work-area for skilled employees, and all of Northern Ireland for manager, professionals and associate professionals. This area, weighted by job category, is 34.8 percent Catholic and shows Catholics underrepresented overall, but not among clerical staff, sales people, plant and machine operatives and elementary occupations. The narrower of the two alternative catchment areas considers the North Belfast, Larne, Carrickfergus and Newtownabbey area for all job categories except professionals and managers; it is only 30.4 percent Catholic and suggests underrepresentation overall and among management, professionals and associate professionals. The narrowest area seems too confined a comparison, however,

Conformance with MacBride principles: Caterpillar reached an agreement on implementation of the MacBride principles and cooperation with IRRC monitoring of F.G. Wilson in early 2002, prompting the withdrawal of a shareholder resolution on the subject from the New York City pension funds. Emerson Electric had reached a similar agreement shortly before it sold its stake in F.G. Wilson to Caterpillar several years ago.

Affirmative action outreach - F.G. Wilson notes that it "recognises the need for continued positive action to encourage equality of opportunity." It employs a broad array of affirmative action measures aimed at increasing the Catholic proportion of its work force. It uses welcoming statements for Catholics in its ads, along with an EEO statement, it conducts outreach in schools and provided IRRC with a list of all schools with which it has contacts, meets with community leaders and has made special efforts to attract the unemployed, who are disproportionately Catholic. F.G. Wilson also has established links with a number of community groups in both Catholic and Protestant areas, many of which are in neighborhoods with high unemployment in North and West Belfast. The company told IRRC that it has used two government initiatives to hire the long term unemployed, noting that the Bridge to Employment program has been much more successful than the New Deal program in attracting and retaining employees from the long term unemployed.

F.G. Wilson set goals and timetables in 1997 to increase the Catholic proportion of applicants and appointees for manual and clerical/administrative posts to "not less than 25 percent" and to increase the overall Catholic proportion of the work force to 25 percent. The company has achieved the overall goal, but has fallen most substantially short for clerical staff. Catholics currently account for only 16 of the 100 clerical jobs. But the company has nearly reached its goal for skilled workers, where Catholics now make up 24.3 percent of the category, up from 23 percent in 2003 and under 17 percent in 2002. Catholics also account for nearly 32 percent of plant and machine operatives, another area in which F.G. Wilson has reached its affirmative action goal.

In 1994, when IRRRC first began monitoring the company, Catholics accounted for just 17 percent of operatives, 13.2 percent of skilled workers and only 9.3 percent of clerical staff. Among the company's 1994 work force of 909 employees with identified religion, Catholic accounted for just 19 percent of the total. It is not clear if the increases in Catholic representation have been accomplished primarily through the addition of the West Belfast plant or through change at the company's other facilities.

The affirmative action agreement provided for the company and the Equality Commission to review progress toward its goals annually. F.G. Wilson says its policy is under "constant review" for effectiveness, although company officials told IRRRC in a

Chill factor and neutral workplace -The company's main facility is located on the outskirts of Larne, just off a major motorway, and employees do not need to travel through any specifically Catholic or Protestant areas to get to work. The West Belfast plant is close to hardline areas from both communities, but is located in the heart of heavily Catholic West Belfast; the location is 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.

No sectarian or offensive materials may be displayed at the company, which has taken pains to maintain a neutral workplace; F.G. Wilson notes it has disciplined and dismissed employees who have violated its neutral workplace policy. The company is closed for about 10 days around the time of the July marching season, and its typical sectarian unrest, 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 handbook asserts that F.G. Wilson "treats all forms of harassment, intimidation and victimisation seriously." The harassment policy includes protection from victimization or retaliation against complainants. The policy explicitly prohibits a variety of religious harassment and intimidation, in physical, verbal or nonverbal forms, and notes that such harassment "includes conduct which creates an intimidating, hostile or humiliating working environment." Prohibited verbal harassment can include "talk about political incidents, shootings, bombings, parades or demonstrations [and] the articulation (singing, whistling or humming) of party tunes." Complainants are directed by the company to report any problems to their supervisor or the next level of management; they may be accompanied by another employee when interviewed by company officials. The policy says that "all aspects of a complaint will be treated seriously, dealt with expeditiously and as far as possible, be treated in the strictest confidence."

F.G. Wilson has provided workshops and training on addressing sectarian harassment and intimidation for its managers and supervisors, although not for shop floor workers, using materials from the Equality Commission and employers' associations. F.G. Wilson is a party to the Joint Declaration of Protection between the Engineerin

Grievances -Complainants have filed a total of 13 grievances against the company at the Fair Employment Tribunal since 2000, four are pending. One employee in the West Belfast plant filed his complaint after leaving the company following an attack with a thrown paint hook from an unidentified employee. The second man said the company discriminated against him after he was alleged to have attacked a Catholic; he refused to cooperate in the company's investigation of the incident and left the firm, then filed the case at the tribunal. The third man, whose has filed two cases, works in the Newtownabbey plant and filed his initial case after the company upheld only part of his internal complaint of discrimination; F.G. Wilson reprimanded the perpetrator of verbal harassment but rejected the complainant's contention he unfairly missed a promotion. Five claims were withdrawn, two following settlements between 2001 and 2005. Three complaints were dismissed in 2004 and one was conciliated in 2002.

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Chevron

Type of Tie	franchise				
MacBride Agreement	yes	Underrepresentation	unknown	FET Discrimination Findings	0
Agreement Date	1991	Affirmative Action	not applicable	FET Settlements	0

• Texaco

Location	Belfast terminal, 68 service stations
Business	marketing and distribution of petroleum products
Fair Representation	Insufficient data are available to determine if any group is significantly underrepresented.
Employees	2 (as of July 2004), plus a few hundred at service stations

2005 Survey Response: partial

Available information: Texaco has two employees at its directly owned Texaco Ltd. subsidiary, which markets and distributes petroleum products from a facility in the Belfast docks area. The company has an agreement with shareholder proponents of the MacBride principles and says it observes the principles "as appropriate and consistent with the legal framework."

The company also reports that it has a total of 59 Texaco branded service stations in Northern Ireland, two more than in 2003. Almost all of them--58--are operated by independent dealers who have fuel sales contracts with Chevron. Chevron owns one site--down from five in 2003--that is rented and run by independent operators. The company also supplies its fuel to 19 other sites--up from only two in 2003--through its authorized dealer network. It reports that many of the service stations in Northern Ireland are sole proprietorships with just one location, and that Chevron does not have records of how many people work at each site. Assuming each site has between three and five workers, there would be anywhere from 234 to 390 people working at Texaco stations around Northern Ireland.

Compliance with NI fair employment law and Code of Practice: The company "has no responsibility" for "employment practices or requirements" at the stations operated by independent agents as it "does not own any of the properties or any part of the business." At the sites it does own, the independent operators "are responsible for employment practices and requirements." At the 19 sites in the authorized dealer network, each operator "is responsible for employment practices and requirements." The company says that its staff "maintain high ethical standards in regard to our employees and expect our business partners to act in a responsible, ethical manner towards employees and to comply with all legal requirements."

Underrepresentation analysis: No information is available on the religious breakdown of Chevron workers in Northern Ireland. Making any assessment of fair representation at the company's various operations, most of which employ only a few people in independently run businesses, would in any case be problematic.

Conformance with MacBride principles: The company reached an agreement on MacBride compliance with investor advocates of the MacBride principles in 1991.

Affirmative action outreach - Not applicable.

Chill factor and neutral workplace -IRRC is not aware of any sectarian problems at Texaco service stations in Northern Ireland. The stations are spread fairly evenly all around the province.

Grievances -No fair employment grievances have been filed against the company.

Citigroup

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	8/01	Affirmative Action	not applicable	FET Settlements 1

• CitiFinancial Europe PLC

Location	Belfast, Portadown, Newtownards, Newtownabbey
Business	consumer finance
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of Dec. 2004)
	Protestant 8
	Catholic 7
	Other 2
	Total 17

2005 Survey Response: full

Available information: Citigroup's U.K. subsidiary, CitiFinancial Europe, has a small presence in Northern Ireland, providing consumer financial services in offices in Belfast, Portadown, Newtownabbey and Newtownards. The company was formerly called Associates Capital. Citigroup provided a complete survey response and has given IRRC copies of its fair employment and harassment policies. Employment rose from 13 at the end of 2002 and has remained at 17 since 2003.

In November 2004, Citigroup announced it would set up a new back office IT center in Belfast, creating up to 400 jobs over the next five years developing software to support its corporate and investment banking business in Europe, the Middle East and Africa. The company also will collaborate with three Belfast secondary schools to set up an academy of finance to train prospective workers aged 16 to 18 in a two-year program. Plans call for a location in central Belfast for this new "center of excellence." The investment is "tremendously exciting," according to Northern Ireland secretary of state Paul Murphy. InvestNI is contributing £7.6 million to support the approximately £20 million investment. **Compliance with NI fair employment law and Code of Practice:** The company says that it adheres to Northern Ireland fair employment law and follows the recommendations of the Code of Practice. The EEO policy says the company will not discriminate in any aspect of employment. Further, it says the company is "committed beyond its statutory requirements to eliminate discrimination and disadvantage amongst its employees," and that the policy must have employees' active participation to be effective. The policy provides detailed descriptions of what constitutes direct and indirect discrimination, although its references to applicable statutes do not include the Northern Ireland fair employment law, although the policy is dated December 2001 and post-dates this law. The policy does say that in Northern Ireland, "reasonable efforts must be made to ensure that termination procedures do not penalize a minority group."

CitiFinancial Europe uses job agencies to advertise vacancies, rather than placing recruitment ads directly itself. It doesn't use an interview panel to select candidates, but this is not uncommon for small employers and all staff who select candidates have received EEO training; the company always reviews the religious composition of applicant pools and new hires to make sure each community is fairly represented. The company's legal department reviews redundancies to determine their impact on equal opportunities issues before they are implemented. All employees receive comparable training, which the company monitors. The district manager is "aware of all the responsibilities" imposed by the company's EEO policies and reports up the chain of command. The company has no trade unions, and has not consulted with workers on fair employment matters, but has discussed its policies with the Equality Commission.

Underrepresentation analysis: Neither group appears underrepresented at the company.

Just 13 people applied for openings in the last monitoring period, which ended in December 2004, and five were hired: two Protestants and three Catholics. During the previous monitoring period, the company had 24 applicants and nine new hires. The company has not made anyone redundant in the last few years. The company

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says it consults census data to determine what its catchment area breakdown should be, and recruits province-wide for top level jobs.

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

Affirmative action outreach - No affirmative action efforts appear to be warranted.

Chill factor and neutral workplace -IRRC is not aware of any sectarian problems at the company's operations.

Grievances -A woman filed a discrimination complaint against the company in June 2002, according to the FET register; the case was withdrawn following a settlement in October 2003. The company's grievance procedure calls for employees to report policy violations to the human resources department or the company's internal audit department at U.K. headquarters. The policy prohibits victimization directed against those who complain, and allows complaints to be made anonymously. The procedures are detailed and precisely lay out for employees how to bring a complaint and how it will be handled in a timely fashion.

Claire's Stores

Type of Tie	equity				
MacBride Agreement	no	Underrepresentation	no	FET Discrimination Findings	0
Agreement Date	not applicable	Affirmative Action	not applicable	FET Settlements	0

• Claire's Accessories UK

Location	18 locations province-wide
Business	fashion accessories
Fair Representation Employees	No group appears to be significantly underrepresented at the company overall. (Data as of 2005)
	Protestant 5
	Catholic 3
	Other 37
	Total 45

2005 Survey Response: full

Available information: Claire's Stores has 18 locations around Northern Ireland including Ballymena, Enniskillen, Newtownabbey, Bangor, Omagh, Newry, Craigavon, Newtownards, Lisburn and Belfast. Its 2005 survey response indicates the company has 45 full-time and 118 part-time employees. The company's work force as of 2003 stood at 119 employees, down a little from 145 in 2002 with many of these workers presumably working part-time. The company verified employee numbers for IRRC in December 2004 and responded in full to the survey for the first time this year.

Compliance with NI fair employment law and Code of Practice: Claire's says it complies with the local fair employment laws in Northern Ireland and the Code of Practice, and cooperates with the Equality Commission. The company makes its employees aware of all job openings, which are publicly advertised on the Internet, in the Belfast News Letter, other local papers and on notices posted in job centres and on store windows. An EEO statement is included in employment advertisements and EEO training is provided to employees involved in hiring processes. When selection panels are used to review candidates, the company does not attempt to have both communities represented, which can be difficult at smaller employers such as this. Claire's does review the religious composition of its applicants and new hires to determine success rates by community, a useful check to ensure no bias has crept into selection processes. In its survey response, the company said "all employees in skilled and upper level jobs have access to all programmes included in our training manual."

The company says Claire's "strives to ensure that all employees and candidates are treated equally and exposed to all job and promotional opportunities available, regardless of background, religion, or beliefs." It says it encourages "all employees and candidates from all religious backgrounds."

Underrepresentation analysis: The company employs workers in two categories, managers and sales representatives. No group appears to be underrepresented when the company's work force is compared to the working age population in Northern Ireland as a whole, the best comparison given the company's locations around the province and the employment category. However, 82 percent of the company's workers were classified as "other," a figure that indicates a potential problem with the company's monitoring procedures. The company is obligated to classify employees by community affiliation if they do not designate a community on monitoring forms, using data on the schools attended or other personal information. The company appears to be unaware of this "residuary method" of employee classification, which is described in the fair employment Code of Practice. It told IRRC "we do not have procedures in place to sub-classify individuals using such criteria" and "such sub-classifications are not perceived to be useful to our human resources department as religious background is not taken into account when hiring decisions are made."

Conformance with MacBride principles: The company has no agreement on the MacBride principles. Its first shareholder resolution on the subject received 12 percent support in 2003, 7.9 percent in 2004 and 12.1 percent in

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2005. The company says the principles are unnecessary because its operations are already fair and existing Northern Ireland fair employment law is sufficient to ensure equity.

Affirmative action outreach - It does not appear any affirmative action measures are warranted.

Chill factor and neutral workplace -IRRC has no specific information about sectarian problems at any of the company's 18 stores around Northern Ireland.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal.

Coca-Cola Co.

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	9/04	Affirmative Action	not applicable	FET Settlements 2

• **Coca Cola Bottlers (Ulster) Ltd.** (24% owned)

Location	Lisburn, Omagh		
Business	soft drink bottling		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of Feb. 2005)		
	Protestant	308	[63.4%]
	Catholic	181	[36.6%]
	Other	32	
	Total	521	

2005 Survey Response: full

Available information: The company has responded in full to IRRC's survey for the last two years. IRRC met with company representatives in 2005. Coca-Cola owns what it terms a "non-controlling ownership interest" in Coca-Cola HBC of Greece, the immediate parent of the bottling company in Northern Ireland. Coca-Cola Bottlers (Ulster) Ltd. has bottled Coca-Cola beverages for many years, but Coca-Cola's relationship with Coca-Cola HBC was less direct until 2000 when it acquired a 24 percent stake in the bottling company. Coca-Cola Bottlers plans to combine all its operations on the island of Ireland into a new facility located at Knockmore Hill in Lisburn. The company estimates the facility will be up and running in 2007, when the current Lisburn site and the Republic of Ireland locations will close. Northern Ireland politicians have worked closely with the company throughout the selection process for the new site. Coca-Cola Bottlers reported, "all the main political parties made representations to the company to offer support and assistance in maintaining employment within the Lisburn area." The positive impact restructuring will have on job creation is enhanced by the company's decision to build the new facility only about five miles away from the former site. Workers in the Republic of Ireland, on the other hand, are likely to face redundancies when their facilities close.

Coca-Cola's primary business is the manufacture and sales of beverage concentrates and syrups, which it sells to more than 300 bottling companies with which Coke has business relationships: it has no ownership interest in about one-quarter of the bottlers, a non-controlling ownership interest in 58 percent of them, and a controlling interest in just 8 percent. Coca-Cola HBC falls in the second category; Coca-Cola as of December 2004 owned a 24 percent stake. Coca-Cola HBC's policies, management and governance structure is separate from Coca-Cola's, although the two "work together to find common ground and take common action in many areas," Coca-Cola said.

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

In its survey response, the company said all jobs are advertised externally, although it uses an internal promotion track to move up sales employees to higher positions and generally hires internally when filling more senior sales posts. All employees are notified about positions open to internal candidates. Job ads are placed in the *Belfast Telegraph*, local and regional newspapers and government job markets. In December 2004, Coca-Cola HBC conducted a major advertising campaign in Northern Ireland and the Republic of Ireland through the *Belfast Telegraph* and the Irish Times. It always uses more than one person to interview job candidates, sometimes ensures both communities are represented on the panel, and always ensures interviewers have received EEO training. The company also reviews the religious composition of applicant pools and new hires to determine community success rates, which can be a useful check to ensure no bias has crept into the selection process. It uses the same process for promotions. Training is open to all employees and needs are determined on a company-wide basis. Other employee training requests are considered "based on the capability requirements of the organization."

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Employees receive EEO and harassment training, which outlines their "personal responsibility as employees and the consequences of non-compliance."

The company says it manages all redundancies "according to the specific circumstances," and that there are "no blanket rules for all occasions," although it never makes employees redundant on a last in-first out basis. All redundancies are managed in concert with the company's trade union.

The local managing director has responsibility for ensuring the human resources department complies with the company's equality policies. The local board of directors monitors compliance and receives reports on these policies and their implementation. Management consults with trade unions about internal policy changes and procedures.

Underrepresentation analysis: Neither Catholics nor Protestants appear to be underrepresented overall at the company's operations in Lisburn where it appears the majority of the company's employees work. The Omagh facility is a warehouse and delivery depot where about 20 employees work. Coca-Cola reported that nearly 60 percent of its workers live in the Belfast travel-to-work area; the rest live throughout Northern Ireland.

Protestants appear to be underrepresented in the associate professional and technical category when compared to a catchment area defined as the Belfast travel-to-work area, which is 33 percent Catholic. Employees in this category now make up a quarter of Coca-Cola Bottlers' work force because the company recently reclassified its field sales employees (formerly in the sales category) as associate professional and technical workers to comply with new Equality Commission guidelines. Protestants appear to be underrepresented among associate professionals as a result of this categorical shift. IRRC previously compared them to a catchment area that is 42.7 percent Catholic, more than the readjusted 33 percent.

The company had approximately 660 applicants for employment in the 2005 monitoring year, about 100 fewer than in 2004. More than half of the applicants sought jobs as associate professionals and salespeople. Catholics made up almost 75 percent of applicants whose religion was identified. The company ended up hiring 66 people, including 33 Catholics (50 percent). Almost half of the 76 leavers were Catholics in the most recent monitoring period.

Conformance with MacBride principles: In September 2004, Coca-Cola wrote to New York City Comptroller William Thompson and said that the company "is committed to fostering a diverse work force throughout our worldwide operations," and that this commitment "is integral to our corporate identity and to our ability to thrive." It says it has "benefited from the various cultural insights and perspectives of the societies in which we do business," and that the company's "future success will depend on our ability to develop a worldwide team that is rich in its diversity of peoples, cultures and ideas." Coca-Cola said it is "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 applicable to our particular situation" with its non-controlling ownership stake in Coca-Cola HBC. Coca-Cola also promised to respond to IRRC's annual survey of the Northern Ireland bottling operation.

Affirmative action outreach - The company says that it maintains fair representation through regular monitoring and that "affirmative action would be taken in the event of an imbalance." The company puts an EEO statements in its ads and has used job markets in particular areas. It says the Equality Commission has not raised any concerns about underrepresented groups. Coca-Cola Bottlers says that "representation in management and professional posts is continuously monitored to ensure balance" and that balance is also ensured in the other categories. It notes that Catholics hold roughly half of the management and professional posts.

Chill factor and neutral workplace - Neither of the company's locations in Belfast and Omagh should pose a chill factor for either community. To address potential sectarian harassment and intimidation in the workplace, the company provides workshops and training for all employees, using materials from the Equality Commission and a local consultant who specializes in EEO matters. Coca-Cola Bottlers (Ulster) Ltd. also says it "posts notices internally [to] remind people of our responsibility to provide a harmonious working environment where all sections of our community feel free from harassment or victimization." Company representatives told IRRC in 2005 that the most recent incident of sectarianism was graffiti written on the bathroom room wall several years ago. It has not had any recent problems.

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Grievances -Two complaints were filed against the company in 2000; both were withdrawn following settlements in 2002 and 2003. The new head of HR believes 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.

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Computer Sciences

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	maybe	FET Discrimination Findings
Agreement Date	11/03	Affirmative Action	no	FET Settlements
				0
				0

• CSC Computer Sciences

Location	Derry, Ballymena, Belfast		
Business	IT outsourcing		
Fair Representation	Protestants might be significantly underrepresented.		
Employees	(Data as of July 2005)		
	Protestant	15	[28.8%]
	Catholic	37	[71.1%]
	Other	3	
	Total	55	

2005 Survey Response: full

Available information: CSC manages aerospace outsourcing contracts for a number of large U.S. defense contractors, including Raytheon, which it works with in Northern Ireland. IRRC first identified CSC's Northern Ireland subsidiary in 2003. The company has provided complete responses to IRRC's surveys since then, providing information on its work force and fair employment policies and practices.

Compliance with NI fair employment law and Code of Practice: The company says that its operations adhere to Northern Ireland's fair employment law and Code of Practice. All jobs are publicly advertised, all employees are notified of positions open to internal applicants, and jobs are advertised via the Internet and through the company's website. CSC uses an interview panel with more than one person to screen applicants, and sometimes but not always is able to ensure cross-community representation on interview panels. Employees that are involved in candidate selection receive EEO training, and the company always reviews the religious composition of applicant pools and new hires to determine community success rates.

Underrepresentation analysis: Protestants appear to be underrepresented at CSC among professionals and overall when compared to all of Northern Ireland, an appropriate comparison since the catchment area for this employment category is usually the entire region. The company only employs two categories of workers, professionals, who account for nearly 85 percent of the work force and managers. CSC does not agree with this assessment and believes a work force break down by site would show there is no underrepresentation. CSC told IRRC that 30 of its 46 professionals are based in Derry—a heavily Catholic region of Northern Ireland—but it did not say how many of these workers were Catholics. IRRC is also unaware of how many employees are located at the Ballymena site versus the Belfast site. Without additional information, it is impossible to draw conclusions about CSC's work force, but even with a heavy presence Derry, it seems Protestants may be underrepresented.

The company appears to have reorganized their associate professionals and technical workers under the professional category because in the previous monitoring period it employed 43 associate professional and technical workers and no professional employees.

CSC says it generally draws employees from three regions, Derry City Council, Ballymena Borough Council and the Belfast City Council, which corresponds with its three locations. The religious portion of these areas varies greatly; Derry is nearly 74 percent Catholic while Belfast is 49 percent. But, both managers and professionals are typically recruited from a catchment area including all of Northern Ireland, which is 42.7 percent Catholic. In IRRC's comparison of CSC workers to this catchment area, Catholics exceed the 42.7 percent mark and comprise 71.2 percent of the work force.

Protestants also appear to be underrepresented among applicants and new hires in the 2005 monitoring period as well. The company reports, "All of the recruitment exercises in 2005 have actually attracted a lot of applicants from the Republic of Ireland." It also says all the recruitment in the most recent monitoring period was for the Derry office, which is located in a heavily Catholic area. It notes that County Donegal borders Derry and "is

almost 100% Catholic, which accounts for the large proportion of Catholic applicants and appointees." More than 80 percent of applicants were Catholics in 2005, and new hires had an even higher proportion of Catholics.

Thirty-four of CSC's employees are drawn from the Derry city council, 16 from the Belfast city council and five from Ballymena. In previous years when the company employed workers in other employment categories that had smaller catchment areas than all of Northern Ireland, IRRRC weighted representation by location and Protestants still appeared to be underrepresented.

At relatively small companies such as CSC, changes of a handful of workers can shift the proportions of representation significantly, but even a conservative assessment of the company's fair representation now suggests the company needs to make efforts to recruit more Protestants. The company told IRRRC that all of its recruitment in the last two years has been in the Derry area and that "possibly as a result of the continuing peace process the majority of the applicants were actually from the Republic of Ireland and therefore Catholic," which has dramatically changed the composition of its applicant pool. This also would change IRRRC's catchment area assessment, making it more Catholic and lessening or erasing the extent of Protestant underrepresentation. IRRRC was not able to obtain census data from the Republic of Ireland to revise the above analysis, however. CSC says that Derry openings do not attract applicants from around the province, but only from the Derry area and nearby portions of County Donegal in the Republic.

Conformance with MacBride principles: In response to IRRRC's surveys, CSC indicated that its policies currently reflect the fair employment standards embodied in the MacBride principles; the company also said that it was willing to respond in full to IRRRC's annual fair employment monitoring survey.

Affirmative action outreach - CSC in 2003 concluded that no affirmative action was warranted given its work force breakdown, although it appears there may be some overrepresentation of Catholics. CSC continues to hold this view, which is buttressed by its description of a catchment area that is more heavily Catholic than the Northern Ireland-only census figures suggest.

Chill factor and neutral workplace -CSC says that no chill factor exists for employees at its operations. It has used materials from the Equality Commission to provide workshops or training on sectarian harassment and workplace intimidation for managers and supervisors.

Grievances -No discrimination grievances have been filed against the company at the Fair Employment Tribunal. The company says that its standard grievance procedure covers all types of issues, and "allows the employee to raise the grievance with the most appropriate manager."

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Crane

Type of Tie	equity				
MacBride Agreement	no	Underrepresentation	yes	FET Discrimination Findings	0
Agreement Date	not applicable	Affirmative Action	yes	FET Settlements	0

• Crane Stockham Valve

Location	Belfast
Business	industrial check valves; oil field equipment
Fair Representation	Catholics appear to be significantly underrepresented.
Employees	(Data as of Feb. 2004)
	Protestant 70 [88.6%]
	Catholic 9 [11.4%]
	Other 5
	Total 84

2005 Survey Response: none

Available information: Crane acquired portions of Stockham Valve, including that company's Belfast operations, in 1997. In 1999, Crane closed or downsized several European plants, and the Belfast facility has seen a significant decrease in its work force, which dropped from 154 employees in 1999 to 84 in 2004. Stockham Valve never responded to IRRC surveys, but Crane has provided overall employee figures to IRRC in response to 2003 and 2004 IRRC reports on shareholder resolutions asking for implementation of the MacBride principles. The shareholder resolution was re-filed in 2005, but omitted because the proponents missed the deadline for submission.

Compliance with NI fair employment law and Code of Practice: Unknown, although it appears the company is taking some affirmative action steps (see "Affirmative Action" section).

Underrepresentation analysis: Catholics continue to be clearly underrepresented compared to the Belfast travel-to-work area, the most immediately plausible catchment area. In February 2004, Catholics made up 11 percent of the work force; Catholic representation is up from only 7.9 percent in 1996.

Conformance with MacBride principles: The company has no MacBride implementation agreement. Crane has received a shareholder proposal asking it to implement the principles in each of the last three years; it got 12.9 percent support in 2002, 8.3 percent in 2003 and 11.6 percent in 2004. A company official indicated to IRRC in 2003 that the company considers the annual reporting requirement for an agreement on MacBride implementation to be too onerous. Reporting requirements under Northern Ireland's fair employment law are considerably more detailed than IRRC's, however. In its 2004 proxy statement urging investors to vote against the shareholder resolution, management said that adoption of the MacBride principles would be duplicative of current policies and would make the company "accountable to two sets of similar but not identical fair employment guidelines," which would be burdensome. It also said adoption of the principles "could lead to confusion, conflicts and, potentially, unfairness in the workplace."

Affirmative action outreach - There is evidence that the company has made progress in hiring Catholics. The company identifies itself as an equal opportunity employer in recruitment ads, which have included statements specifically welcoming "applications from members of the Roman Catholic community who are currently underrepresented in its work force." Ads appear in the Catholic *Irish News*, as well as in the *Belfast Telegraph*.

Chill factor and neutral workplace -The company's location has been off-putting to Catholics, but Crane appears to have made efforts recently to counteract this problem. A company official told IRRC in 2003 that "we do our best," but that the plant is in a Protestant area and "people have to be comfortable to work there."

Grievances -No fair employment grievances have been filed against the company.

Crawford

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	2/04	Affirmative Action	not applicable	FET Settlements 0

• Crawford & Co. (UK)

Location	Belfast
Business	insurance services
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of July 2005)
	Protestant 16
	Catholic 6
	Other
	Total 22

2005 Survey Response: full

Available information: Crawford's office in Belfast sells liability and property insurance. Crawford says that it is "the world's largest independent provider of claims management solutions to insurance companies and self-insured entities, with a global network of more than 700 offices in 67 countries." The company provided a complete response to IRRC's survey for the last two years, providing information on its employees and a description of its fair employment policies.. Crawford closed an office in Londonderry in 2003.

Compliance with NI fair employment law and Code of Practice: The company says its operations adhere to Northern Ireland fair employment law and the recommendations of the Code of Practice. Specifically, it says it publicly advertises all job openings, and notifies all employees of positions open to internal applicants. It uses the *Belfast Telegraph* to post vacancies, and it uses an EEO statement in ads. During hiring and selection, it sometimes uses a panel with more than one person to interview job candidates, and sometimes is able to ensure cross-community representation on panels (the small size of its management team sometimes precludes this). All those involved in candidate selection have received EEO training, and the company reviews the religious composition of applicant pools and new hires to determine community success rates. Crawford says it works closely with its London human resources team to ensure that redundancy and promotion decisions "are made in a proper fashion." The company says that while it has a very small team in Northern Ireland, it is "determined in a proper way to take every opportunity to target fair levels of representation."

The company's U.S. website says that it will not discriminate based on "race, creed, color, religion, sex, sexual orientation, age, national origin, Vietnam veteran status, or the presence of any sensory, mental or physical disability, unless based upon a bona fide occupational qualification. Further, Crawford & Company will not tolerate harassment based on any of these categories. This policy applies to recruitment or recruitment advertising, hiring, training, upgrading, promotion, demotion, transfer, termination, rates of pay or other forms of compensation, and all other aspects of employment." The website says the company periodically "analyzes all areas of employment in the Corporation to assure adherence to the principles of equal opportunity."

Underrepresentation analysis: No group appears to be underrepresented when the company's work force is compared to a catchment area weighted by job category, with the company's 13 professionals compared to Northern Ireland as a whole and its nine clerical staff compared to the Belfast travel-to-work area. The resultant catchment area would be about 39 percent Catholic, more than the current 27 percent Catholic share of the work force. Still, given the small size of the company, this difference is not statistically significant.

Conformance with MacBride principles: In February 2004, the company's board of directors passed a resolution officially accepting the MacBride principles, prompting the New York City pension funds to withdraw a shareholder resolution on the subject. The company says it is "committed to fair employment and positively operating and supporting the initiatives, including the IRRC."

Affirmative action outreach - No affirmative action is warranted given the present work force composition.

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Chill factor and neutral workplace -The company's Belfast office on Newforge Lane is just off a main road through the neutral and well-off Malone Road in south Belfast. Its location should not pose a chill factor for either community in Northern Ireland, as the company points out. Crawford says it chose the location "to ensure that no staff would have any such issues" with security or chill factor. Crawford has provided managers with workshops and training on issues of sectarian harassment and intimidation using materials from the Equality Commission. Management level employees receive training on sectarian harassment with materials from the Equality Commission.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal. The company reports that it has grievance and equal opportunity policies, which are made available to employees through the internal company database.

Danaher

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	2/03	Affirmative Action	not applicable	FET Settlements 0

• Qualitrol-Hathaway

Location	Belfast
Business	power utility monitoring equipment
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of Feb. 2005)
	Protestant 37 [71.2%]
	Catholic 15 [28.9%]
	Other 5
	Total 57

2005 Survey Response: full

Available information: Danaher acquired the power and process segment of Hathaway Corp., which owned Hathaway Systems in Northern Ireland, in 2002. Danaher has provided complete responses to IRRC's survey since 2003 as well as information on its work force and fair employment policies. Employment at the company has fluctuated over the years between 51 in 2004 and 70 in 2000. It hired 10 additional employees in the most recent monitoring year, bringing the 2005 work force up to 57.

Compliance with NI fair employment law and Code of Practice: Danaher's corporate standards of conduct apply to all its subsidiaries; breach of the EEO policy is considered gross misconduct. The company says its operations adhere to Northern Ireland's fair employment law and Code of Practice. All jobs at the company are publicly advertised and all employees are notified of positions open to internal applicants. Ads are placed in the *Belfast Telegraph* and in government job markets. The company always uses a panel with more than one person when interviewing job applicants, and sometimes ensures cross-community representation, but does not review the religious composition of applicant pools and new hires to determine community success rates. This level of monitoring is not necessary if the company's balance appears to be fairly representative of the area where it is located, as is the case with Danaher.

Selection for redundancy is based on an employee rating procedure involving performance, qualifications, ability, timekeeping and responsibilities and does not appear to be done on a last-in, first-out basis. Employees are selected for promotion based on merit, while training is provided to employees as needed for the job.

Danaher says that there is "close management involvement in EEO" and that monitoring reports are given monthly to senior management.

Underrepresentation analysis: No group is underrepresented at the company as a whole. The number of Catholic professionals is a little lower than expected, but no conclusions can be drawn given that there are only eight workers in this category. IRRC compared the company's work force to a weighted catchment area that considered all of Northern Ireland for the company's upper level jobs and Belfast and Newtownabbey, the areas closest to the plant, for clerical and manual jobs; the weighted total would be about 42 percent Catholic. The company estimates its catchment area to be 30 to 35 percent Catholic. It recruits from all of Northern Ireland for management jobs.

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

Affirmative action outreach - No affirmative action efforts appear warranted.

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Chill factor and neutral workplace -Hathaway 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 says that it has never found any need to offer specific assurances to minority employees at its workplace. Managers, supervisors and shop floor workers have received anti-harassment training based on material from the Equality Commission.

Grievances -No fair employment grievances have been filed against the company. The EEO policies "prohibit unlawful discrimination and specifically encourage employees to go to a higher level of management with concerns if necessary," Danaher reports. Employees are suspended pending an investigation and statements from witnesses, and an appeals process is in place. The company notes that it has no specific procedures for allowing complaints to be made to a co-religionist, but says that "since management is mixed we anticipate an objective discussion."

DuPont (E.I.) de Nemours

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings	0
Agreement Date	3/92	Affirmative Action	no	FET Settlements	0

• DuPont UK Ltd.

Location	Londonderry				
Business	Kevlar				
Fair Representation	No group appears to be significantly underrepresented at the company overall.				
Employees	(Data as of 2005)				
	Protestant	39	[36.1%]		
	Catholic	69	[63.9%]		
	Other	2			
	Total	110			

2005 Survey Response: full

Available information: DuPont spun off its Invista division, which included most of its former Northern Ireland operations, to privately held Koch Industries in April 2004. Koch is based in Kansas. DuPont retained its Kevlar production facility in Northern Ireland, however.

Compliance with NI fair employment law and Code of Practice: The company's policies as described to IRRC appear to comply with Northern Ireland's fair employment law.

Underrepresentation analysis: No group appears to be underrepresented at the company when the work force is compared to a weighted catchment area that considers all of Northern Ireland as the recruitment area for senior level jobs, the Londonderry travel-to-work area for associate professionals and skilled employees and Derry for elementary occupation workers who make up the rest of the work force. This area, weighted by job category, would be about 68 percent Catholic; the difference between this and the company's representation of nearly 64 percent is not statistically meaningful.

Conformance with MacBride principles: Du Pont reached an accord with shareholder proponents of the MacBride principles in 1992 and has for the most part cooperated with IRRC's monitoring process, although it has not agreed to meet with IRRC staff at its facilities in Northern Ireland.

Affirmative action outreach - No affirmative action efforts are warranted based on current work force representation.

Chill factor and neutral workplace -The company's main site outside Derry appears to be accessible to both communities. Sectarian flags and emblems are banned.

Grievances -No fair employment grievances have been filed against the company in recent years.

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Emerson Electric

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	9/98	Affirmative Action	not applicable	FET Settlements 1

- Copeland Co.**

Location	Cookstown, Co. Tyrone		
Business	scroll compressors		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of March 2005)		
	Protestant	108	[45.9%]
	Catholic	127	[54%]
	Other	7	
	Total	242	

2005 Survey Response: full

Available information: The company began production in April 1997. Emerson has provided regular survey responses, giving detailed information on work force composition and its equal opportunities policy. Employment at Copeland was to reach 300 by 1999, but instead has fluctuated, dropping by 30 employees to 242 in 2005.

Compliance with NI fair employment law and Code of Practice: The company says its employment practices adhere to Northern Ireland fair employment law and the Code of Practice. Its EEO policy forbids discrimination on a variety of grounds, including "perceived religious belief or political opinion." The policy also says Copeland "does not practice positive discrimination." Failure to comply with the policy can result in dismissal. Copeland advertises openings in the *Belfast Telegraph*, local and regional newspapers, and in government job centers. It also includes EEO statements in its ads. Interviews are always conducted by more than one person, cross community representation is ensured where possible, staff involved in candidate selection have received EEO training and applicant success rates are tracked by religion. The EEO policy calls for careful record keeping at each stage of hiring and promotion, as stressed by the Equality Commission and Code of Practice. The redundancy policy specifically calls for no discrimination, and sets up an appeals procedure for complainants. Copeland has not set up a consultation process with worker representatives on equal employment issues.

Underrepresentation analysis: No group appears to be underrepresented at the company as a whole or in any specific job categories. IRRC estimates the company's catchment area, weighted by the number of employees in each job category, with different areas for each level, to be about 57 percent Catholic. Copeland says the local area is "restrictive in terms of knowledge and experience necessary for management and professional jobs," and considers broader recruitment areas for these posts. IRRC's weighted area considers all of Northern Ireland (42.7 percent Catholic) for professional jobs, an area within 20 to 25 miles of the plant (about 56 percent Catholic) for associate professional and skilled employees, and an area within about 10 miles of the plant (about 59 percent Catholic) for clerical workers and plant and machine operatives, which Copeland says reflects how far its employees currently travel to work.

Protestants have been underrepresented in the skilled worker employment category, which accounts for 29 percent of the work force, in previous years, but both Catholics and Protestants appear to be fairly represented in the 2005 monitoring period.

The proportion of Protestant applicants rose to 42 percent in 2005 (115 Catholics out of 257 prospective employees), from 31 percent in 2004. A trend toward Protestant underrepresentation was not apparent in 2005. Of the 26 employees with identified religion hired by Copeland in the most recent monitoring period, almost half were Protestants. But the work force reduction of approximately 30 workers has had a larger impact on the proportional breakdown than new hires.

Conformance with MacBride principles: In September 1998, Emerson reached an understanding with MacBride advocates on implementation of the principles and independent monitoring. The company says that its

policies reflect the fair employment standards of the principles. Corporate officials from Emerson also have said they believe the company is "doing the right thing" in Northern Ireland by providing jobs and employment opportunities in disadvantaged areas.

Affirmative action outreach - Copeland's policy notes that it will take affirmative action and set goals and timetables "where necessary." It is unclear if the company has actively sought out ways to boost the proportion of Protestant applicants, but that proportion rose in 2005 to 45 percent.

Chill factor and neutral workplace -The EEO policy forbids "flags, emblems, posters, graffiti or the circulation of materials or the deliberate articulation of slogans or songs which are likely to give offense to or cause apprehension among particular groups of existing or potential employees." Copeland has a policy that describes in some detail what constitutes inappropriate behavior, with specific examples, covering sexual and racial as well as religious and political harassment. The grievance procedure for this policy is similar to the equal opportunities grievance procedure (see the "Grievances" section), but includes in addition provisions for transferring affected employees so they need not continue to work together, whatever the outcome of an investigation.

The company says it does not take any particular steps to ensure workplace security or safety for workers coming to and from the plant, but this may not be needed, given the area where Copeland is located. The company says its location would not pose a chill factor to either Catholics or Protestants. Although Copeland recognizes no trade unions, the company "supports and displays a Joint Declaration of Protection" for employees regarding sectarian harassment and the maintenance of a neutral workplace.

Grievances -One complaint was filed against the company in 2003; it was settled in December 2004.

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General Electric

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings	0
Agreement Date	9/98	Affirmative Action	yes	FET Settlements	1

- **First National Home Finance Ltd.**

Location	Belfast
Business	banking
Employees	7 (as of Jan. 2005)

2005 Survey Response: partial

Available information: GE first identified its GE Consumer Finance Home Lendings UK as one of its subsidiaries in its response to IRRC's 2003 survey. Employment has dropped from 13 in that year to only seven in 2005. The company operates a call center under the name First National Home Finance Ltd.

Compliance with NI fair employment law and Code of Practice: GE says First National Bank's policies adhere to fair employment law in Northern Ireland. The company says it publicly advertises all job openings and uses an employment agency for recruitment purposes also notifying all employees of open positions. The company always uses an interview panel for hiring, ensuring panels represent both communities and that those involved in hiring receive training on equal employment issues. First National says it always reviews the religious composition of new hires to determine success rates by community, and that it is currently briefing the employment agency it uses "on the need to redress the balance as necessary and attract applicants from specific communities."

Underrepresentation analysis: Neither community appears to be underrepresented.

Conformance with MacBride principles: GE reached an agreement with MacBride activists on implementation of the MacBride principles in 1998.

Affirmative action outreach - No affirmative action measures appear warranted at the company, which says it monitors any underrepresentation and organizes development plans as appropriate.

Chill factor and neutral workplace - The company reports no chill factor is present for either community.

Grievances - The company states that "an independent and confidential ombudsman system is currently being implemented. We currently have a 'managing concerns at work process' managed by independent managers and human resources to investigate any claims of harassment on any grounds." IRRC is not aware of any grievances filed against the company.

- **GE Medical Systems**

Location	Belfast
Business	sales/service of medical equipment
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of June 2005)
	Protestant 7
	Catholic 8
	Other
	Total 15

2005 Survey Response: partial

Available information: Employment at the company grew from only three in 1998 to 15 at present. Workers at the service office maintain the company's medical diagnostic imaging equipment that is used in hospitals and clinics in Northern Ireland.

Compliance with NI fair employment law and Code of Practice: GE Medical Systems says the company's policies adhere to fair employment law in Northern Ireland.

Underrepresentation analysis: Neither community appears to be underrepresented overall at the company.

Conformance with MacBride principles: GE reached an agreement with MacBride activists in 1998 about MacBride implementation.

Affirmative action outreach - No affirmative action measures appear warranted. The company states that all job openings are publicly advertised in the *Belfast Telegraph*. The company notifies all employees about positions open to internal applicants. The company says employees who are involved in candidate selection have received EEO training and interview panels are always represented by both communities. It occasionally reviews the religious composition of its applicants and new hires to determine success rates by community. The company notes that management receives training on sectarian harassment using materials from the Equality Commission.

Chill factor and neutral workplace -No chill factor appears to exist for workers of either community.

Grievances -IRRC is not aware of any discrimination complaints filed against the company at the Fair Employment Tribunal. With regards to its grievance procedures, the company says "standard GE procedures are in place."

• **Hurst (Charles)** (30% owned)

Location	Belfast and seven other towns		
Business	vehicle sales, service		
Fair Representation	Catholics appear to be significantly underrepresented.		
Employees	(Data as of 2005)		
	Protestant	694	[76.9%]
	Catholic	209	[23.1%]
	Other	55	
	Total	958	

2005 Survey Response: full

Available information: GE's wholly owned Woodchester Investments subsidiary holds a 24 percent equity stake in Lookers PLC, the owner of Charles Hurst. Charles Hurst acquired Savilles Auto Village in November 2003 and informed IRRC in 2005 that the latter's employment information is tallied with Hurst's figures in its survey response. Charles Hurst responded fully to IRRC's fair employment survey for the first time in 1999 and has sporadically provided updated information. It completed the survey in 2005 and also met with IRRC staff.

Equality Commission staff told IRRC in September 2004 that Hurst's personnel manager in Manchester, England, was vigorously implementing the company's EEO policies. Local managers met with IRRC staff in Northern Ireland in 1999.

The company's work force has expanded substantially in the last few years, growing to the present level of 972 workers (958 full-time) from only 566 in 1997. Hurst has 18 locations including car dealerships, tire repair stores and/or repair shops in Bangor, Belfast (eight), Coleraine, Lisburn, Londonderry, Newtownabbey, Newtownards, Omagh and Portadown (3). Company representatives told IRRC that the growth over the last four to five years will probably not continue. They believe the market is stagnant and noted a 2 to 3 percent drop in sales throughout the car industry, this drop however, has not yet affected the work force. Charles Hurst does not intend to expand further unless an opportunity arises to acquire another company.

Compliance with NI fair employment law and Code of Practice: Charles Hurst reached an affirmative action agreement with the Fair Employment Commission in November 1998 and subsequently drafted a new equal opportunities policy and provided EEO training to all staff. Charles Hurst's managing director has overall responsibility for equal employment programs, and the personnel manager has day-to-day responsibility. The only positions not advertised publicly are those at the most senior level where the Board of Directors may promote someone within the company. The company reported that it advertises job openings in several newspapers, including those read mainly by the Catholic community but in 2005 company representatives told IRRC that most

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of its positions are advertised online or through government-sponsored job centers. Interview panels always represent both communities and those involved in candidate selection receive EEO training. Charles Hurst reports that it reviews the religious composition of its applicant pool and new hires and that it conducts exit interviews with those leaving the company.

Underrepresentation analysis: Catholics appear to be significantly underrepresented at Charles Hurst in the overall work force. IRRC compared managers, professionals, skilled workers and sales associates to all of Northern Ireland and associate professionals, administrative staff, machine operatives and all other workers to a weighted catchment area that averages the Catholic representation in each of the company's 27 locations. Based on the weighted catchment area, Catholics should account for approximately 40 percent of Charles Hurst's staff, but instead only make up a little over half that amount, at 23.1 percent. Catholics are most underrepresented in managerial positions, where they make-up only 10 of 100 employees, and in the skilled worker category, which is nearly two-thirds Protestant. The percentage of Catholics in the overall work force steadily rose from 8.4 percent in 1994 to 24 percent in 2003, and now stands at just over 23 percent.

Catholics also appear underrepresented among applicants and new hires. Historically, there was a substantial differential between the percentage of Catholic applicants and the percentage of Catholic new hires that suggested the company needed to carefully examine its selection procedures for bias, but this was not evident in the figures provided in the company's 2005 survey response. Catholics appear to be underrepresented among applicants to managerial, administrative and skilled labor positions. Overall, if applicants are compared to the company's weighted catchment area, Catholics would be expected to account for 473 of the 1,142 applicants, but fell short of the mark by about 40 people.

Catholics were underrepresented among new hires because nearly all of the eight new managers with identified religion are Protestants. The company reported that in the 2005 monitoring period, it had a total of 70 apprentices with identified religion, including 44 Protestants and 26 Catholics. There was no underrepresentation among the eight workers that were made redundant in the 2005 monitoring period.

Charles Hurst told IRRC that the work force reflects its acquisition of three companies that had predominately Protestant employees, Neville Johnston, David Prentice and Savilles Auto. Two of those companies were conducting affirmative action plans when they were acquired. According to Charles Hurst representatives, the acquired work force of the three companies accounts for more than 30 percent of the current work force.

Conformance with MacBride principles: Although General Electric has agreed to implement the MacBride principles for its wholly owned subsidiaries, Charles Hurst has not reached a similar agreement. The company failed to cooperate with IRRC's monitoring process from 2001 to 2004, but responded in full to the 2005 survey.

Affirmative action outreach - In its 1998 affirmative action agreement with the FEC/Equality Commission, Charles Hurst set a target of increasing the Catholic proportion of applicants and appointees to not less than 35 percent over the first three years of the plan. It met this goal in 2002 and exceeded it in the 2005 monitoring period when nearly 38 percent of applicants with identified religion were Catholics. It also set an initial goal of increasing the Catholic proportion of its work force to 25 percent in three to five years and a longer term goal of 30 percent in five to 10 years. It has failed to met this goal thus far; Catholics currently account for only 23.1 percent of the work force and have never accounted for more than 24 percent. Company representatives said they seek the best caliber of applicants and from that pool, select the best person for the job. They believe, "without discrimination against Protestants, you can't do it any other way."

While there were clearly some fair employment concerns at the company in the past, sources familiar with the company in Northern Ireland told IRRC that in the late 1990s the situation had changed and that the company had begun to make efforts in this area. It is worth noting there have not been any cases filed at the Fair Employment Tribunal since 2001. Hurst has developed links with schools serving the Catholic community, and conducts mock interviews and offers work experience to students.

Chill factor and neutral workplace -The company's history of having a Protestant majority could dissuade Catholics from applying, although management has taken steps to create a neutral environment. The company has said it is committed to a workplace free from flags and emblems. Managers and supervisors undergo training in this area, and the company says that all employees are aware that harassment in the work place is a dismissable

offence. Hurst's main location is readily accessible from both sides of the community, although relatively close to hard-line areas on both sides.

Grievances -Four complaints have been filed against the company since 2000. One was withdrawn after settlement in December 2005 and the other three were dismissed in 2003. In the second half of the 1990s, the company settled several discrimination complaints, paying out some \$82,000; management has changed since these complaints were filed and the company has changed its policies.

Two Fair Employment Tribunal complaints were filed against Savilles Auto Village in March 1996 and June 1999; both were withdrawn.

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Goodrich

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	12/02	Affirmative Action	not applicable	FET Settlements 0

• Goodrich Control Systems

Location	Belfast
Business	software engineering for aircraft engine controls
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of Feb. 2005)
	Protestant 26
	Catholic 12
	Other 3
	Total 41

2005 Survey Response: full

Available information: Goodrich bought TRW's aeronautical unit, which included an operation in Northern Ireland, in 2002. TRW responded to IRRC's annual survey and Goodrich has likewise consistently completed the survey.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to the Fair Employment and Treatment (Northern Ireland) Order 1998 and to the Code of Practice. The site manager and human resources manager are jointly responsible for equal opportunities policies and practices. The company reports that "all employees are advised of our equal opportunity policy." Goodrich uses the *Belfast Telegraph* and the Internet to advertise job opportunities. All employees are notified of positions open to internal applicants, but not all internal transfers/promotions are advertised externally. When selecting new hires, Goodrich always uses an interview panel with a member of the human resources department in England present. Both communities are not always represented on the interview panel, but everyone with the authority to hire candidates receives equal opportunity training. The company does not review its applicant pool by religious community to determine success rates.

Underrepresentation analysis: Goodrich does not monitor from which district council areas it draws its employees. The company employs workers in three categories, but the vast majority are employed as professionals. Catholics account for slightly less than 32 percent of the work force and this portion is in line with the figures for all of Northern Ireland -- the best catchment area for this category -- at 42.7 percent. Catholic representation has fallen from a high of 36.4 percent in 2002, but has remained relatively stable since 2001. In 2000, there was an underrepresentation of Catholics in the work force, but both communities appeared fairly represented in the following monitoring period.

Conformance with MacBride principles: Goodrich affirmed in December 2002 that it was committed to equal employment worldwide and in its new Northern Ireland operations. It said its practices "reflect the fair employment standards embodied in the MacBride principles as amplified" and that it would cooperate with IRRC monitoring. TRW reached a similar agreement earlier in 2001.

Affirmative action outreach - No affirmative action measures appear warranted at the this point, although the company should monitor its work force to ensure both communities continue to be fairly represented.

Chill factor and neutral workplace -The company is located in central Belfast, a neutral area that poses no chill factor to Protestants or Catholics. The company addresses sectarian harassment and workplace intimidation by using materials from the Equality Commission to conduct training for managers and supervisors.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal. With regard to its grievance procedure, the company says that its human resources department in Birmingham, England, is the first point of contact for employees with complaints.

Hewlett-Packard

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	maybe	FET Discrimination Findings	0
Agreement Date	1989	Affirmative Action	not applicable	FET Settlements	0

• Hewlett-Packard

Location	Belfast
Business	computer sales, consultancy and service
Fair Representation	Protestants might be significantly underrepresented.
Employees	(Data as of Feb. 2005)
	Protestant 24 [45.3%]
	Catholic 29 [54.7%]
	Other 10
	Total 63

2005 Survey Response: full

Available information: The company regularly responds to IRRC's survey. Employment at the company's Belfast operations, which were part of Compaq before the April 2002 merger of the two firms, has gone up slightly and now stands at 63 workers.

Compliance with NI fair employment law and Code of Practice: The company's recruitment procedures appear to fall within the guidelines of the Code of Practice. It places advertisements in the Belfast daily newspapers and includes an EEO statement in the ads. All employees involved in candidate selection have received EEO training. The company uses an interview panel when screening job candidates "where practically feasible," and reviews the religious composition of its applicants and new hires to determine community success rates.

Underrepresentation analysis: Protestants appear to be underrepresented at the company and specifically underrepresented among its sales department. Hewlett-Packard believes its Belfast location is accessible to all districts and areas. IRRC compared the company's associate professionals and administrative staff to the Belfast travel-to-work area and the remaining work force (managers, professionals, sales associates) to all of Northern Ireland. In the last year, the Catholic portion of the work force has increased by approximately 4 percent, as the Protestant portion fell by 4 percent. Although this change is enough to reflect less than fair representation, the work force has grown by only four employees and only one worker was made redundant in the last year. The company employs 63 Protestants and Catholics and a slight change in the religious composition of the work force significantly changes the assessment. If Hewlett hired two additional Protestants, both communities would appear fairly represented. The company hired two additional workers in the most recent monitoring period from a pool of seven applicants. Both communities were fairly represented in these categories. The company underwent a corporate hiring freeze during the most recent monitoring period.

Conformance with MacBride principles: Digital Equipment, a predecessor firm to Compaq, reached an agreement with shareholders on MacBride implementation in 1989--the first company to do so. 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 the IRRC data monitoring efforts in Northern Ireland." Hewlett-Packard appears to be honoring these previous commitments.

Affirmative action outreach - The company's EEO policy commits the company to take "positive action" for groups "who have been traditionally disadvantaged" and were underrepresented in hiring or promotion over a 12-month period. Although affirmative action outreach steps may not be warranted at this time, the company should monitor work force fluctuations to ensure a trend of Protestant underrepresentation does not emerge.

Chill factor and neutral workplace -No problems are apparent.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

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International Business Machines

Type of Tie	equity	Underrepresentation	no	FET Discrimination Findings	0
MacBride Agreement	yes	Affirmative Action	not applicable	FET Settlements	0
Agreement Date	11/92				

• IBM United Kingdom

Location	Belfast
Business	computer sales and service
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of May 2005)
	Protestant 19
	Catholic 9
	Other 5
	<hr/> Total 33

2005 Survey Response: full

Available information: The company responds fully to IRRC's fair employment surveys each year, providing policy information and data on the overall religious composition of its work force. Employment has steadily inched upwards and now stands at 33 employees.

Compliance with NI fair employment law and Code of Practice: Based on the information available to IRRC, it appears the company's practices are consistent with the Code.

Underrepresentation analysis: Neither community appears to be underrepresented in IBM's work force. The religious mix has changed somewhat since 1991, but has remained about the same for the last three years.

Conformance with MacBride principles: IBM and MacBride shareholder proponents reached an agreement in 1992. The company said that it would "make lawful efforts" to implement the principles, "to the extent they are applicable."

Affirmative action outreach - Affirmative action efforts at the company do not appear warranted.

Chill factor and neutral workplace - The company's offices are in a neutral area that does not pose a chill factor to either community. The company has informal and formal grievance policies; the informal policy allows an employee to bring an unresolved matter to the attention of human resources, which may assign an independent investigator. The company's Speak Up program also allows employees to raise concerns without revealing their identity to anyone but the Speak Up coordinator.

Grievances - There have been no recent discrimination complaints filed against IBM in recent years.

Lauder (Estee)

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	10/98	Affirmative Action	not applicable	FET Settlements 0

• Estee Lauder Cosmetics

Location	department stores province-wide		
Business	sale of cosmetic products		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of April 2005)		
	Protestant	68	[56.2%]
	Catholic	53	[43.8%]
	Other	7	
	Total	128	

2005 Survey Response: full

Available information: Estee Lauder has responded to IRRC's surveys since 1995. The company reported its highest employee total to date with 128 workers and no redundancies in 2005. Employees work for several Estee Lauder companies in department stores around the province, selling cosmetics.

Compliance with NI fair employment law and Code of Practice: Estee Lauder says its policies and practices adhere to the Code of Practice, and that all personnel involved in selection have received EEO training. Lauder's personnel policies appear to encourage the systematic practices favored by the Code, and although there is no specific reference to religious discrimination in the Northern Ireland context, Estee Lauder's recruitment manual urges staff to use objective criteria and not "race, religion or gender" so as to avoid allegations of discrimination. The company says it advertises in the *Belfast Telegraph*, local and regional newspapers, its company intranet and government job markets and publicly advertises all openings. Interview panels are used, sometimes including representative from both communities, and the company reviews the religious composition of applicant pools and new hires to determine success rates by community. Redundancies are based on "competence, conduct, attendance and service," which are also the criteria for promotion.

Underrepresentation analysis: No group appears to be underrepresented at the company. Just under half of the new hires in the 2005 monitoring period were Catholics. Over half of the applicants in the past year were also Catholics, which when compared to Northern Ireland's working age population suggests an underrepresentation of Protestants among applicants. Long term trends did not show this underrepresentation, however.

Conformance with MacBride principles: The company reached an agreement with shareholder proponents of the MacBride principles about their implementation as appropriate to Estee Lauder operations in 1998.

Affirmative action outreach - Long-term applicant and hiring figures do not suggest any need for affirmative action for any group, although the company's applicants in the last two monitoring years were heavily Catholic.

Chill factor and neutral workplace -Employees generally work in large department stores in neutral shopping districts, so they are unlikely to face any chill factor.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal.

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Manpower Inc.

Type of Tie	equity			
MacBride Agreement	no	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	not applicable	Affirmative Action	unknown	FET Settlements 0

- Manpower PLC**

Location	Belfast
Business	recruitment staffing solutions
Fair Representation	Protestants appear to be significantly underrepresented.
Employees	(Data as of 2003)
	Protestant 294 [34.5%]
	Catholic 559 [65.5%]
	Other 82
	Total 935

2005 Survey Response: none

Available information: Manpower is a worldwide employment services company; its presence in Northern Ireland has expanded substantially from the early part of the decade, with a jump from only 62 employees in 2001 to 935 in 2003. Its work force has shrunk since by about 300 workers. The company did not respond to IRRC's survey in 2004 or 2005.

Compliance with NI fair employment law and Code of Practice: The company did not provide IRRC with any information about its fair employment policies or practices.

Underrepresentation analysis: Protestants are substantially underrepresented at the company when the work force is compared to either the Belfast travel-to-work area or to Northern Ireland as a whole. The Equality Commission says Manpower has very high level of turn-over and that its entire staff may change on a yearly basis. It had 2,000 applicants in the most recent year; it hired 500 new employees.

Conformance with MacBride principles: The company did not provide IRRC with any information about its policies on MacBride compliance.

Affirmative action outreach - The company did not provide IRRC with any information about any affirmative action efforts; outreach appears warranted given the apparent underrepresentation of Protestants.

Chill factor and neutral workplace - The company's location in a mixed neighborhood in Belfast should not pose an deterrent for employees of either community; the immediate neighborhood of Manpower's offices roughly reflects Northern Ireland's population breakdown.

Grievances - Two discrimination complaints logged at the Fair Employment Tribunal were withdrawn in 2000 and 2001.

- Right Courtts**

Location	Belfast
Business	management consulting
Fair Representation	Insufficient data are available to determine if any group is significantly underrepresented.
Employees	5 (as of 2004)

2005 Survey Response: none

Available information: The company has a small office in Belfast at Clarendon Docks, a neutral location close to downtown, that employs fewer than 11 workers. The company lists the office on its website but it is not registered with the Equality Commission and has not appeared in any of the commission's reports on fair employment. The company has not responded to IRRC's annual survey. No complaints have been filed against the company at the Fair Employment Tribunal.

Marsh & McLennan

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	yes	FET Settlements	0

• Mercer Human Resources Consulting

Location	Belfast
Business	pensions consultancy/administration
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of 2003)
	Protestant 30
	Catholic 11
	Other 1
	Total 42

2005 Survey Response: none

Available information: Marsh & McLennan's subsidiary changed its name from William M. Mercer Ltd. to Mercer Human Resource Consulting Ltd. in 2001. It usually responds in full to IRRC surveys, but has not for the last two years. In 2004, the company told IRRC it was overwhelmed by the lawsuit filed by New York attorney general, Eliot Spitzer. The suit charged that the company engaged in bid rigging and inappropriate fees and press reports indicate that 14 company officials have entered guilty pleas as of September 2005. As a result of the lawsuit, Marsh's business is in a decline and 5,500 jobs were eliminated as of May 2005. It is unclear how much of an effect the decline has had on its Northern Ireland business.

Compliance with NI fair employment law and Code of Practice: The company says Mercer follows the recommendations as well as the legal requirements of the Code of Practice and that it adheres to the standards established by the Fair Employment and Treatment (Northern Ireland) Order 1998. The company advertises job openings on the Internet and in trade publications. MacBride proponents advocate advertising in all three Belfast dailies. The company uses an interview panel but says it never ensures that both communities are represented on the panel. Those involved in candidate selection have undergone training, and the company reviews the religious composition of applicant pools and new hires.

Underrepresentation analysis: Neither community appears to be underrepresented in the company's overall work force or in individual job categories when compared to weighted catchment areas that are 34.1 percent to 40.8 percent Catholic. The catchment areas consider all of Northern Ireland to be appropriate for managers, administrators and professionals and the Belfast travel-to-work area for its clerical and secretarial workers. Managers, professionals and associate professionals constitute more than 80 percent of its employees. The number of applicants reported by the company has fallen dramatically in the last three years, and the number of new hires has been low for the last four years--between three and seven new hires annually. The company has begun to use more recruitment agency applicants and while it initially did not monitor the religion of these prospective employees, in 2003 the company said that, in the future, these applicants would be monitored. Five of the 19 new hires over the last four years have been Catholics.

Conformance with MacBride principles: The company says that Mercer Human Resource Consulting recognizes the commitments made by Marsh & McLennan when it reached agreement on implementation of the MacBride principles with shareholder activists in 1994.

Affirmative action outreach - No affirmative action measures appear warranted.

Chill factor and neutral workplace -The company's location in central Belfast should not pose a chill factor for either Catholics or Protestants.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

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- **Marsh (UK), Ulster Insurance Services, Marsh Financial Services**

Location	Belfast and Strabane		
Business	insurance services		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of June 2003)		
	Protestant	49	[65.3%]
	Catholic	26	[34.7%]
	Other		
	Total	75	

2005 Survey Response: none

Available information: In past reporting to IRRRC, Marsh combined the work forces of three of its Northern Ireland subsidiaries--Marsh (UK) Ltd., Ulster Insurance Services and Marsh Financial Services. Its 2003 survey response indicated that it had made no changes to its previous fair employment policy in Northern Ireland.

Compliance with NI fair employment law and Code of Practice: The company says it follows the Code of Practice and Northern Ireland fair employment law. It says that fair employment issues are discussed at regular staff association meetings and that religious harassment is on the agenda at all Belfast executive meetings. The company includes a statement in its employment advertisements that it is an equal opportunity employer, although it advertises only in the *Belfast Telegraph* and government job markets; ads could get wider distribution if the company used all three daily Belfast papers. The company uses an interview panel with representatives from both sides of the community and tracks applicant success rates by religion. Company representatives involved in candidate selection have received training on equal employment issues and both communities are represented on interview panels. Marsh & McLennan uses 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 works with the Irish Congress of Trade Union's Counteract project to address potential sectarian harassment and intimidation.

Underrepresentation analysis: As of 2003, neither community appeared to be statistically underrepresented in the overall work force, or in any individual job categories. The firm's Catholic representation in the overall work force grew dramatically from 1992, and in 2000 the proportion of Catholics rose to 25.3 percent, erasing an apparent underrepresentation. In 2003, the percentage of Catholics stood at about 35 percent. The number of new hires from 2001 to 2003 declined compared to earlier periods.

Conformance with MacBride principles: The company and shareholder activists reached an agreement on implementation of the MacBride principles in 1994.

Affirmative action outreach - The company had what it termed a "voluntary agreement with the FEC," although specific affirmative action efforts no longer appear warranted as Catholics seem to have achieved fair participation in the overall work force and in individual job categories.

Chill factor and neutral workplace -The company's location in central Belfast should not pose a chill factor for either Catholics or Protestants.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

McDonald's

Type of Tie	equity/franchise			
MacBride Agreement	yes	Underrepresentation	maybe	FET Discrimination Findings 0
Agreement Date	1994	Affirmative Action		FET Settlements 0

• McDonald's Restaurants

Location	24 locations province-wide		
Business	fast food		
Fair Representation	Protestants might be significantly underrepresented.		
Employees	(Data as of March 2005)		
	Protestant	81	[43.5%]
	Catholic	105	[56.5%]
	Other	15	
	Total	201	

2005 Survey Response: full

Available information: There are 24 McDonald's restaurants located in Northern Ireland. Ten 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. McDonald's has another nine franchise holders in Northern Ireland, with 16 restaurants listed separately in this profile: 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.

The company has always provided a complete response to IRRC's survey, describing its fair employment policies in detail and providing an employment breakdown for its directly owned subsidiary. Information on the religious breakdown of the work force at all but one of the franchises is available from the Equality Commission's monitoring report.

Compliance with NI fair employment law and Code of Practice: The company says that McDonald's Restaurants Ltd. "follows Northern Ireland law concerning the recruitment, interviewing and hiring process." The company "uses an independent outside consultant to compile information with respect to religion (and gender) regarding applications and employees hired in its restaurants," and the consultant provides this information to the Equality Commission. McDonald's franchise holders provide this information to the Equality Commission separately and McDonald's Restaurants Ltd. does not receive copies of the monitoring reports. The company's franchisees also operate under agreements that require them "to comply with local laws."

McDonald's says that it advertises all openings publicly, and notifies all employees of positions open to internal applicants. It advertises openings in local and regional newspapers, government job markets, and the Internet. The company uses job markets in particular areas when it conducts affirmative action, and also has conducted what it dubbed "communications sessions" with restaurant staff on this subject. McDonald's does not use panels with more than one person to interview job candidates, as is generally recommended by fair employment experts, but all staff involved in candidate selection have received EEO training. The company also reviews the religious composition of applicant pools and new hires to determine community success rates, which can be an important check to ensure no bias has crept into the selection process. The company says all promotions are based on merit, and that training is non-discriminatory. The company's U.K. diversity policy specifically states that in Northern Ireland, it will "aim to make sure that no job applicant or existing employee is treated less favourably on the grounds of their political opinions," and that discrimination on setting standards [that] some employees are less likely to be able to achieve because of their political opinions" constitutes indirect discrimination.

Managers "are held directly responsible for adherence to the diversity policy," the company says. The company describes at some length these responsibilities, saying managers must "challenge questionable behavior and

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practices" and manage "their teams to create work environments where all employees are valued." Senior management at the company has overall responsibility for enforcing the company's diversity policy, and the human resources department "regularly monitors and reviews the policy to determine the need for additional action to ensure compliance," McDonald's told IRRC. The policy was last updated in December 2003.

Underrepresentation analysis: Protestants appear to be underrepresented at the managerial level and in the overall work force, even when the presumably youthful work force is taken into consideration. If it is assumed that managers at McDonald's range in age from 25-34, the Catholic catchment area grows from 42.7 percent for all of Northern Ireland to 46.1 percent for this age group. Even so, Protestants appear to be underrepresented when compared to either catchment area. Catholics make up 61 percent of McDonald's managers, even though the appropriate figure as compared to the catchment area is around 46 percent. Catholics make up 53.5 percent of the personal service workers whose religion was identified at the company, slightly exceeding the expected 49.6 percent figure generated from census data for workers currently aged 16 to 24. These employees make up 62 percent of the work force, while managers account for nearly all the remaining employees.

Protestants appear underrepresented among applicants and new hires for personal service occupations at the company, as well. The company had 359 applicants whose religion was identified, 63 percent of whom were Catholics. Catholics also made up 66 percent of the 125 employees hired. The company may need to examine its recruitment practices to encourage Protestant applicants.

Conformance with MacBride principles: The company says its policies reflect the fair employment policies embodied in the MacBride principles and that it will respond in full to IRRC's annual fair employment survey. McDonald's Restaurants Ltd.'s distributes its diversity policy to all franchisees in Northern Ireland, and says it strongly encourages the franchisees "to adopt such a policy as their own for their restaurants." It is unclear how this policy is enforced at the franchise restaurants or how many franchisees have adopted it, but McDonald's Restaurants Ltd. conducts an annual business review of each franchise restaurant to determine "expandability of each franchise holder," and as part of this assessment, "an in-depth assessment of various people practices is 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 -- McDonald's told IRRC that its administrative officer for Northern Ireland will attend a training course in affirmative action held by the Equality Commission. The company also notes that managers "are held directly responsible for adherence to [the] diversity policy." It is not undergoing any other affirmative action measures. McDonald's may want to look carefully at its recruitment flows, site by site, to determine if it is attracting a sufficient number of Protestant applicants.

Chill factor and neutral workplace -IRRC is 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, but IRRC is not aware of any problems of this nature. There have 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 appear to be what police in Northern Ireland call "ordinary decent crime" that is unrelated to the "troubles."

McDonald's says it holds 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 are provided for staff at potentially sensitive times, and restaurants have been closed temporarily as protection." The company provides cars to restaurants managers and senior staff above that level. The company's diversity policy specifically forbids sectarian harassment of staff, and all employees have received workshops or training on sectarian harassment and intimidation using materials from the Equality Commission and other sources.

Grievances -McDonald's Restaurants Ltd. had a grievance filed against it at the Fair Employment Tribunal; it was dismissed in December 2004. Company policy states that grievances may be brought to several levels of managers at the company and employees may be fired for violating the company's diversity policy.

- **Cobain Mark t/a McDonald's Glengormley**

Location	Belfast
Business	fast food
Employees	(Data as of 2003)
	Protestant 33
	Catholic 13
	Other 1
	<hr/> Total 47

- **Connan Paul Ltd.**

Location	Dundonald and Belfast
Business	fast food
Employees	(Data as of 2003)
	Protestant 48 [53.3%]
	Catholic 42 [46.7%]
	Other 9
	<hr/> Total 99

- **Dunluce Restaurants t/a McDonalds**

Location	Coleraine
Business	fast food
Employees	(Data as of 2003)
	Protestant 37 [63.3%]
	Catholic 17 [36.7%]
	Other 15
	<hr/> Total 69

Grievances -One grievance filed against the company in March 2004 was pending as of November 2005. The complainant names the company and several managers as respondents.

- **Hewitt Geoff t/a McDonald's Ballymena**

Location	Ballymena
Business	fast food
Employees	(Data as of 2003)
	Protestant 35 [63.6%]
	Catholic 14 [36.4%]
	Other 3
	<hr/> Total 52

- **JMC Restaurants t/a McDonald's Sprucefield**

Location	Lisburn
Business	fast food
Employees	(Data as of 2003)
	Protestant 77 [69.7%]
	Catholic 32 [30.3%]
	Other 8
	<hr/> Total 117

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- **McDermott Paul t/a McDonald's Connswater**

Location	Belfast
Business	fast food
Employees	(Data as of 2003)
	Protestant
	Catholic 0-9
	Other
	<hr/> Total 65

- **North West Restaurants Ltd.**

Location	3 in Londonderry
Business	fast food
Employees	165 (as of 2004)

- **Rahon Enterprises t/a McDonald's**

Location	Bangor
Business	fast food
Employees	(Data as of 2003)
	Protestant 48 [44.9%]
	Catholic 64 [55.1%]
	Other 6
	<hr/> Total 118

- **S & S Restaurants t/a McDonald's Restaurant**

Location	Newry
Business	fast food
Employees	(Data as of 2003)
	Protestant [13%]
	Catholic [87%]
	Other
	<hr/> Total 65

Merck

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	9/02	Affirmative Action	not applicable	FET Settlements 0

- **Merck Sharp & Dohme**

Location	sales people work from home
Business	sales
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of Oct. 2004)
	Protestant 11
	Catholic 5
	Other
	<hr/> Total 16

2005 Survey Response: none

Available information: Merck has for years maintained a small pharmaceutical sales force in Northern Ireland, which in 2004 grew to 16 workers. The company has been responsive to IRRC surveys and has described its policies and work force breakdown for the last several years. Merck failed to respond to IRRC's survey in the most recent monitoring period; a company representative pledged to respond at a later date but did not follow through.

Compliance with NI fair employment law and Code of Practice: Company managers attend standards training as an active step to implement MacBride principles. The company 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 previously had not been subject to the requirements of the law given its small size. Merck also told IRRC that "we are in the process of reviewing our EEO policies" and said that it would provide more information on its policies following the review. The company has said that it is "fully committed to fostering a diverse work force," and that its worldwide code of conduct "is reinforced through mandatory employee training at all levels." The company code "includes a statement on the company's commitment to the fair treatment of all employees," a commitment that includes "subsidiary non-discrimination policies."

Underrepresentation analysis: When the company's work force breakdown is compared to all of Northern Ireland, no group appears to be underrepresented.

Conformance with MacBride principles: Merck reiterated in 2004 that its policies reflect the principles as amplified. In September 2002, Merck said that it is "committed to taking lawful steps in good faith to conduct business in Northern Ireland in accordance with the MacBride principles that are applicable to our particular situation." The company reached its agreement after inquiries from the State of Connecticut, which is obligated to sell stock in firms in which it holds stock unless the company agrees to implement the principles.

Affirmative action outreach - No affirmative action measure appear warranted.

Chill factor and neutral workplace -The company's employees all work from home. Merck says that because it has no workplace or facilities, the MacBride principle concerning neutral workplace is inapplicable to its situation.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal.

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Nacco Industries

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings	0
Agreement Date	1991	Affirmative Action	yes	FET Settlements	3

• Nacco Materials Handling

Location	Craigavon, Co. Armagh				
Business	industrial fork lift trucks				
Fair Representation	No group appears to be significantly underrepresented at the company overall.				
Employees	(Data as of Feb. 2005)				
	Protestant	450	[60.6%]		
	Catholic	314	[39.4%]		
	Other	14			
	Total	778			

2005 Survey Response: full

Available information: The company has consistently completed IRRC's annual survey since 1997. IRRC interviewed Northern Ireland company officials in the 1990s. In June 2003, the company announced a £33 million investment to make the Craigavon facility a dedicated manufacturing center for a range of trucks with advanced engines and more sophisticated electronics. The company has been making forklifts in Northern Ireland since 1980.

Compliance with NI fair employment law and Code of Practice: Nacco's policy calls for including equal opportunities responsibilities in the written job descriptions of managers and supervisors, and for the maintenance of an employee training program on EEO matters. Harassment is an offense that can be cause for dismissal. Separate policies exist for harassment and victimization. Nacco audits its employment procedures annually, ensures that written descriptions exist for all posts, and says that redundancy procedures are "appropriate and justifiable." Two trained staff conduct shortlisting and interviews, records of decisions are kept at each personnel stage, cross-community representation occurs where possible on selection panels, and managers conduct exit interviews to obtain leavers' views on EEO at Nacco. Supervisors must also debrief all parties to complaints.

Nacco's employee guide concerning harassment and its EEO policy are written up in considerable detail in an easily accessible format. The EEO policy in particular, a 21-page booklet, contains clear instructions for employees on what constitutes harassment and how to begin resolution of a concern or complaint. The policy is more detailed and presented in a clearer format than most other EEO policies of U.S.-connected firms in Northern Ireland that IRRC has reviewed.

As part of an affirmative action agreement it reached with the FEC/Equality Commission after its triennial policy review in late 1997, Nacco revised its personnel practices to ensure they comply with the Code of Practice. Nacco provided equal opportunity awareness sessions and anti-harassment training for all employees.

In 1997, the company began using a pool of temporary employees who work according to production demands. "This has provided greater job security for our core (permanent) work force," Nacco said. The company's use of temporary workers does not appear to raise any particular fair employment concerns; these workers are covered by the company's equal opportunities and grievance policies.

Underrepresentation analysis: Nacco's work force has grown by 76 additional employees since the last monitoring period and Catholics no longer appear to be underrepresented among plant and machine operatives and the work force as a whole as they appeared to be in the past. Both communities with identified religion appear fairly represented across the board in the 2005 monitoring period. Catholics accounted for 55 percent of 105 newly hired machine operatives with identified religion, boosting their proportion in this category by 3 percent to 41 percent. The appropriate catchment area for machine operatives is the Craigavon travel-to-work area, which is 42.9 percent Catholic. Plant and machine operatives constitute approximately 75 percent of the work force.

The number of new hires has continued to grow substantially over the last few years. Nacco took on 126 employees in 2005, up from 96 new hires in 2004 and nine new hires in 2002. There was no overall underrepresentation among applicants in 2005 although Protestants appeared to be underrepresented among applicants for administrators and machine operatives when compared to two possible catchment areas--Craigavon district council where the company is located and the Craigavon travel-to-work area. This downswing in Protestant applicants may help to explain why the Catholic portion of the work force has grown in the last year. No underrepresentation existed among applicants in 2004 or among new hires in both 2004 and 2003. For the 2004 reporting period, Catholics represented 44.5 percent of 557 applicants with an identified religion, up significantly from 37.3 percent of 241 applicants in 2003 and 34.4 percent of 96 applicants in 2002.

The Protestant portion of new hires was low when compared to either catchment area, the Craigavon district council or the Craigavon travel-to-work area as with applicants. The company hired 96 people with an identified religion during the 2004 reporting period, and 43.4 percent were Catholics, down from 12 of 26, or 46.2 percent, in 2003.

Catholics applied in rates consistent with their representation in the broader Craigavon travel-to-work catchment area described above in 2004, the first time since 2000. Three clerical workers were made redundant in 2005, one Catholic and two Protestants. There were no redundancies reported by the company in 2004 or 2003.

Conformance with MacBride principles: Nacco reached an agreement with shareholder proponents of the MacBride principles in 1991. It says it "is making all lawful efforts to implement the fair employment practices embodied in the MacBride principles."

Affirmative action outreach - Nacco's affirmative action plan aimed to have a Catholic proportion of not less than 45 percent among applicants and appointees for all non-management posts by 2000 and an overall goal of increasing Catholic representation in its work force to 40 percent. The company has reached that goal five years later than expected, with Catholic applicants and new hires surpassing the 45 percent mark and Catholic employees making up 41 percent of the work force with identified religion. The company had pledged to actively targeted the Catholic community in job advertisements; its employment ads include welcoming statements for both communities. The company also has developed links with schools, training schemes and organizations that serve the Catholic community. Nacco worked particularly hard at developing an outreach program to schools, including providing work experience, mock interviews and factory tours. Several years ago, Nacco explained that its ability to practice affirmative action measures was limited by its minimal recruitment, which has proven to be the case as Catholic representation has grown along with recruitment in the last two years. The company boosted its work force by 60 employees in 2004, and by an additional 76 in 2005.

Chill factor and neutral workplace -Nacco regularly provides training to employees on its harassment policy and on individual's responsibility to maintain a neutral workplace. The company has stressed its ban on sectarian materials; it has signed a Joint Declaration of Protection with its unions.

Nacco's plant appears to be accessible to both communities, and the religious profile of the applicant pool in recent years has been relatively consistent with the economically active adult population, suggesting that there may be little chill factor, despite serious incidents in the vicinity in the past.

Grievances -Seven discrimination complaints have been filed against the company since 2000. Three of the claims were filed in 2004 by two complainants; one of these was withdrawn in September 2004 and the other two are pending. Two additional claims were withdrawn in 2004, one with settlement. Two of the 2004 cases allege harassment and payments following dismissal, while four allege unfair selection for redundancy. The company settled two other cases in 2004.

The company adopted a new grievance procedure in 1998. As noted above, the policy booklet for employees is highly approachable and clearly laid out. Employees may call an outside help line 24 hours a day to obtain confidential counseling about their concerns.

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Omnicom Group

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	1/02	Affirmative Action	not applicable	FET Settlements 0

• Drury Communications (30% owned)

Location	Belfast
Business	public relations
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of 2004)
	Protestant 9
	Catholic 6
	Other
	Total 15

2005 Survey Response: none

Available information: In October 2000, Omnicom Group Inc. subsidiary BBDO Worldwide acquired Dublin-based Drury Communications, which owned 30 percent of a Belfast firm by the same name. The Belfast company, a public relations firm, has just 15 workers. In May 2001 it broke off from its Dublin parent and announced plans for aggressive expansion in both Northern Ireland and the Republic.

The company has responded to IRRC's survey in the past, providing a work force breakdown and copies of its fair employment policies, but it did not respond in the most recent monitoring period. A company representative pledged to respond to the survey but failed to do so. In its correspondence with IRRC, Omnicom's corporate headquarters wrote that Drury's management said "they would furnish as much information as they felt comfortable furnishing to us with respect to this politically and emotionally charged issue." Because Omnicom is a non-controlling shareholder, the company said, "we can demand no more."

Compliance with NI fair employment law and Code of Practice: Drury Communications says its policies adhere to both the recommendations and the standards set out in the Fair Employment and Treatment (Northern Ireland) Order 1998. The company did not provide detailed information about its hiring and selection procedures, but it did say that it advertises openings in all three Belfast daily newspapers, ensuring both communities are made aware of vacancies. Its policy states that the company will periodically review its selection criteria and procedures so that "individuals are selected, promoted and treated solely on the basis of their merits and abilities which are appropriate to the job." Managers and staff involved in recruitment, employee administration and training are charged with the responsibility of ensuring the enforcement of the non-discrimination policy.

Underrepresentation analysis: Given the small size of the work force, it is impossible to assess any underrepresentation with accuracy. The current work force breakdown is consistent with the religious breakdown of the overall Northern Ireland population. The company considers all of Northern Ireland as a reasonable catchment area for management and professional positions.

Conformance with MacBride principles: In January 2002 the company reached a MacBride implementation agreement and the New York City pension funds withdrew a shareholder resolution on the subject.

Affirmative action outreach - It does not appear that any affirmative action efforts are necessary.

Chill factor and neutral workplace -The company's office is located in downtown Belfast, in a neutral area near the city hall that should pose no problem for workers of either community when traveling to work. The company's policy prohibits the display of flags, emblems, posters and graffiti. It also forbids the circulation of literature "which is likely to give offence or cause apprehension among particular groups of employees."

Grievances -No grievances had been filed at the Fair Employment Tribunal against Drury Communications. The company maintains a grievance procedure for any employees who feel they have received inequitable treatment.

Openwave Systems

Type of Tie	equity				
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings	0
Agreement Date	9/04	Affirmative Action	yes	FET Settlements	0

• Openwave Systems

Location	Belfast
Business	telecommunications software
Fair Representation	Protestants appear to be significantly underrepresented.
Employees	(Data as of April 2005)
	Protestant 40 [42%]
	Catholic 56 [58%]
	Other 13
	Total 109

2005 Survey Response: full

Available information: After a November 2000 merger with Software.com, the company changed its name from Phone.com to Openwave Systems. Openwave is a California firm whose software enables Internet access through wireless telephones, and it acquired Apion Ltd., based in Belfast, in October 1999. Apion was formerly the privately owned subsidiary of Aldiscon, a Dublin-based company, which entered Northern Ireland in 1995. Openwave's software is known in the business as WAP (wireless applications protocol), and the investment in Northern Ireland marks its first product development center located outside Silicon Valley. Openwave has regularly responded in full to IRRC's fair employment surveys. Local managers met with IRRC in 2003 and 2000.

Compliance with NI fair employment law and Code of Practice: The company says it complies with Northern Ireland fair employment law and with the Code of Practice. Openwave advertises in the *Belfast Telegraph* and the News Letter, both typically Protestant papers. The company also uses employment websites, the company website and its internal bulletin boards. It sends reminders of job openings by email to all staff members. A panel of two interviewers assesses candidates, who attend two interviews before receiving an offer, being assessed by four people in all. Openwave tries to ensure that both communities and genders are represented on its interview panels, but it admits that it is often difficult to do so given its size and predominantly male work force. All those with the authority to make hiring decisions attend anti-discrimination training using materials from the Equality Commission. The company also provides training on harassment and anti-discrimination for all employees during their orientation.

Openwave published a formal process for promoting employees in August 2003. The policy calls for promotion based solely on performance. This policy is global in scope though does conform to Northern Ireland code of practice in that it is based on established criteria and all employees are eligible to apply for promotions. Company representatives told IRRC in 2003 that its career tracks are published on the company intranet. The company publishes its equal opportunity policy and its harassment policy in the employee handbook; both policies are modeled after standard policies under European employment law, as well as on model policies published by the Equality Commission.

Underrepresentation analysis: Underrepresentation of Protestants showed up at the company overall and among associate professionals in the most recent monitoring period. The company considers all of Northern Ireland to be an appropriate catchment area for nearly all of its employees, as well as the Republic of Ireland and other countries. It notes that its relatively high percentage of employees who do not classify themselves as either Protestant or Catholic is partially attributable to its high percentage of foreign-born workers who hail from Europe, Asia and Africa. As a high-tech company, Openwave has encountered a shortage of qualified workers in Northern Ireland. The company notes that nearly all of its employees are highly educated, including those who work in clerical positions. IRRC compared the work force to two plausible catchment areas weighted by job category that range from about 34 to 42 percent Catholic, with the more heavily Catholic area assuming recruitment from all of Northern Ireland for all jobs, and the other assuming recruitment for associate

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professionals and clerical staff from the Belfast travel-to-work area. Protestants are underrepresented using any of these assumptions; this is typically the case for high tech firms, IRRRC has found, so the company does not stand out from other Northern Irish software firms.

Any affirmative action efforts the company might consider should be aimed at increasing the number of Protestants among associate professionals, since this category represents nearly 80 percent of the work force. To reflect the working age population of Northern Ireland, this category would have to have about 5 more Protestants, an improvement of recent years.

The company had 38 applicants and 10 new hires in its 2005 monitoring year and although Protestant applicants for associate professional positions may be underrepresented, there was no underrepresentation among new hires. There were no redundancies in 2005, compared to 13 people in 2004.

Conformance with MacBride principles: In September 2004, the company reached an agreement with the New York City pension funds on compliance with the MacBride principles, after the funds proposed a shareholder resolution on the subject. Openwave affirmed in 2005 that it believes its policies reflect the principles.

Affirmative action outreach - In an effort to correct underrepresentation through affirmative action, the company places EEO statements in job postings. Openwave also reported in 2004 that it has updated its existing affirmative action agreement with the Equality Commission. The company has discontinued a scholarship program that used to target Protestant schools for applicants for financial reasons. It does, however, maintain links at universities in Scotland and England, recognizing that young Protestants from Northern Ireland frequently study there, and it also conducts other outreach at local Protestant schools that aims to attract more Protestant and female applicants. The company tracks applicants' community affiliation in accordance with Northern Ireland fair employment requirements.

The company's policy on affirmative action states: "Where appropriate, lawful positive action measures such as special encouragement in advertisements will be used. These measures are available to us in certain circumstances, for example, where there is an underrepresentation of a particular group in specific areas of work. It should be emphasized, however, that selection for employment or internal selection for a new role will always be on merit. Selection based on a person's gender, religion or race constitutes unlawful discrimination--even if that group is currently underrepresented within the company or within a particular job function."

Chill factor and neutral workplace -The company provides workshops and training to all employees, including management, to discourage sectarian harassment and intimidation in the workplace, using materials from the Equality Commission. The company's location in downtown Belfast should not pose a significant chill factor for either community. Its offices close early during the height of the summer marching season. Employees, the majority of whom are able to work at home, may leave at 3 p.m. during this time. The company reports no incidences of sectarian harassment or complaints. The company describes its culture as relaxed and informal, and managers told IRRRC they do not know of any incidents or altercations between employees.

The company's harassment policy includes examples of harassing behavior, delineates employees' rights and responsibilities and describes the managers' role in ensuring a neutral workplace for all.

Grievances -Just one religious discrimination complaint has been filed against the company; it was conciliated in May 2004.

Pfizer

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	5/00	Affirmative Action	not applicable	FET Settlements 0

- **Pfizer UK**

Location	employees work from home		
Business	pharmaceutical sales		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of June 2005)		
	Protestant	12	
	Catholic	15	
	Other	9	
	Total	36	

2005 Survey Response: full

Available information: Pfizer has responded in full to IRRC's annual surveys since 2000, giving a breakdown of its employees by religion and providing fair employment policy information. Until 1999, the company's work force hovered around 10 employees, and Pfizer responded regularly to IRRC's briefer survey for companies that have 10 or fewer workers. In 2003, Pfizer acquired Pharmacia, which had less than 10 employees in Northern Ireland. The acquisition led to a work force high of 39 that year. Employment at Pfizer in Northern Ireland has dropped slightly to 36. All of the company's employees work in sales from home and report to a subsidiary in England.

Compliance with NI fair employment law and Code of Practice: Pfizer says its employment and recruitment policies and practices are "standard throughout the world, with modifications designed to tailor them to local laws and conditions." The company has adopted the Code of Practice and adheres to the Fair Employment and Treatment (Northern Ireland) Order 1998. Pfizer also has in place an "Equal Opportunity Code of Practice" that the company told IRRC it observes when recruiting in Northern Ireland and elsewhere. It started monitoring the religious composition of its work force in Northern Ireland in 2000.

Pfizer says it publicly advertises all openings, on the Internet, on its own intranet and in local and regional newspapers. It receives all of its applicants from recruitment agencies, which prescreen the applicants and forward them to Pfizer. The company appears to have standardized selection procedures. It always uses an interview panel to select prospective employees, and sometimes is able to have both communities represented on the panel. Prospective employees must undergo a competency-based group interview with a sales role-play exercise. A panel of managers makes all hiring decisions. All employees involved in candidate selection have received EEO training, and the company sometimes examines applicant success rates by community affiliation. Promotion is based on merit, and fair employment monitoring ensures employee participation in training programs is equitable. The company has had only one redundancy in the last several years. It says that its redundancy policy is in accordance with its equal opportunities standards. Responsibility for fair employment is part of the Northern Ireland management's obligations.

Underrepresentation analysis: Neither Catholics nor Protestants appear to be underrepresented at the company when its employees are compared to all of Northern Ireland, the area from which the company draws its workers. Pfizer has a Catholic representation of more than 55 percent, exceeding the 42.7 Catholic catchment area for all of Northern Ireland, but not so far out of line as to have an underrepresentation of Protestants, given its small size.

Conformance with MacBride principles: The company reached a MacBride implementation agreement in 2000. The company agreed to cooperate with IRRC monitoring and to take steps as applicable to implement the MacBride principles. Many of the principles are not applicable given that employees work from home. Pfizer uses its training in equal opportunity/discrimination/harassment issues to communicate the standards embodied in the MacBride principles to its managers.

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Affirmative action outreach - Affirmative action measures do not appear warranted.

Chill factor and neutral workplace -Not applicable given that employees work from home.

Grievances -The company's grievance policy stipulates that employees may direct any complaints of discrimination or harassment to their supervisors, Human Resources managers or any other appropriate senior-level person. Pfizer will accommodate employees who wish to voice their complaint to a co-religionist. No grievances have been filed at the FET against Pfizer.

Raytheon

Type of Tie	equity				
MacBride Agreement	no	Underrepresentation	maybe	FET Discrimination Findings	0
Agreement Date	not applicable	Affirmative Action	no	FET Settlements	0

• Raytheon Systems

Location	Derry, Co. Londonderry
Business	software development center
Fair Representation	Protestants might be significantly underrepresented.
Employees	(Data as of Aug. 2005)
	Protestant 9
	Catholic 26
	Other 1
	<u>Total 36</u>

2005 Survey Response: full

Available information: The company has sporadically responded to IRRC's survey and in 2005 it provided updated employment figures. Employment appears to have fallen short of initial goals, and the company announced in 2003 that there would be some redundancies. Data from Raytheon show that the company had only 38 workers in 2003, and currently employs 36 workers. The company began recruiting senior personnel in the summer of 1999 for a software development center in Derry, Co. Londonderry. Some 15 jobs at Raytheon have gone to unemployed individuals, as part of the company's participation in the government's New Deal program aimed at putting the long-term unemployed back to work. Raytheon also bid successfully with Short Brothers Aircraft, the Belfast subsidiary of Canada's Bombardier, for a \$1.3 billion Ministry of Defense airborne standoff radar contract that will add up to 800 jobs at the Shorts facility in Belfast.

Some human rights activists oppose Raytheon's presence in Derry because it is a weapons manufacturer. The company says, however, that its facility in Northern Ireland only develops software and is not directly involved in arms production. Following the U.S.-led assault on Fallujah, Iraq, in November 2004, anti-war activists protested in Derry and announced plans to dig a symbolic grave outside the Derry plant.

Compliance with NI fair employment law and Code of Practice: The company provided IRRC with a copy of its fair employment policy. The company said it has a "systematic and objective recruitment policy, which ensures that applicants are selected solely according to merit."

Underrepresentation analysis: Protestants appear to be underrepresented in the overall work force at Raytheon, depending on catchment area assumptions, although the numbers are small and shifts of only a few employees would change the picture. The company did not provide a breakdown by job category for 2005, but in 2003 reported that more than 80 percent of its workers were professionals. This suggests the work force should be compared to all of Northern Ireland, which is 42.7 percent Catholic, and would suggest Protestant underrepresentation. But if the work force is compared to the Londonderry travel-to-work area, which is 68.8 percent Catholic, there appears to be fair representation.

Conformance with 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 the MacBride principles. Investors gave 10.1 percent support to a shareholder resolution asking for MacBride implementation at the company's 2004 annual meeting and 9.8 percent in 2005. The company says that the majority of the MacBride principles are included in Northern Ireland's fair employment laws and regulations.

Affirmative action outreach - It is not clear that any affirmative action steps are required.

Chill factor and neutral workplace -The company says it has an electronic surveillance and secure entry system in place at its facilities. Its location in Derry is a largely Catholic neighborhood, because Protestants account for less than 10 percent of the neighborhood they may feel uncomfortable arriving and leaving the plant.

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Raytheon says it "seeks positively to provide a harmonious and threat-free working environment by actively promoting our stance against any form of harassment and banning display of any contentious material including slogans, banners and football colours."

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

Sanmina-SCI

Type of Tie	equity				
MacBride Agreement	no	Underrepresentation	yes	FET Discrimination Findings	0
Agreement Date	not applicable	Affirmative Action	yes	FET Settlements	1

- Sanmina-SCI Enclosure Systems Lisburn**

Location	Lisburn				
Business	sheet metal fabrication and electronic assemblies				
Fair Representation	Catholics appear to be significantly underrepresented.				
Employees	(Data as of 2003)				
	Protestant	256	[79.3%]		
	Catholic	67	[20.7%]		
	Other	9			
	Total	332			

2005 Survey Response: none

Available information: In 2001, Sanmina-SCI Corp. acquired its Northern Ireland operations, formerly called E-M-Solutions, after the parent firm, Electronic Manufacturing Systems, filed for Chapter 11 bankruptcy protection. Sanmina-SCI has never responded to IRRC's survey. The Lisburn location was still listed on Sanmina-SCI's website and still appears to be in operation. Privately held Electronic Manufacturing Systems responded once to IRRC's survey, in 1999. EMS had acquired Bemac Engineering, located just outside Belfast in Lisburn, and established it as its European headquarters in 1997.

Compliance with NI fair employment law and Code of Practice: When owned by a previous company, the firm in Northern Ireland said in 1999 that its operations adhered to fair employment law in Northern Ireland and that it followed the recommendations and legal requirements of the Code of Practice. The managing director had overall responsibility for the company's equal employment opportunity program, while the human resources manager had day-to-day responsibility for its implementation. Senior managers also supervised EEO programs. The company used an interview panel to interview job candidates, although both communities were not always represented on the panel. Those involved in candidate selection had received training on equal employment issues and the company reviewed the religious composition of applicant pools and new hires. The company said it publicly advertised all job openings in the *Belfast Telegraph*, as well as local newspapers and job clubs. Its advertisements include an equal employment opportunity statement. All employees were notified of internal openings. No more recent information is available given the company's lack of response to inquiries.

Underrepresentation analysis: Catholics appear to be underrepresented at the company overall, when the company's entire work force is compared to either Lisburn or to the Belfast travel-to-work area. Data from 2003 for new hires also suggest that Catholics were underrepresented. The company told IRRC in 1999 that turnover among managers, professionals and technical staff was limited, however, and that a significant percentage of this group had been with the company for more than five years. Since IRRC has not received work force information from the company for five years, it is not possible to update the detailed underrepresentation analysis. The company's Catholic proportion had been on the increase until 2002, but in 2003 dropped back to just under 21 percent, down from 24 percent in 2002. The company shed another 20 jobs between these two years, and cut 160 jobs the previous year.

Conformance with MacBride principles: The company does not have an agreement to implement the MacBride principles. The proposal of shareholder resolutions to publicly traded companies is the usual route to implementation. The company did not become a subsidiary of a publicly traded company until October 2001, and it has yet to receive any shareholder resolutions on the MacBride principles.

Affirmative action outreach - The company has an affirmative action agreement with the FEC/Equality Commission and has set goals and timetables for Catholic recruitment. In 1999, it said it was conducting outreach in schools, using school/work placements, pursuing links with a training schools and employment

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centers, advertising in specific job clubs and local newspapers, busing employees from specific areas and making special efforts for the unemployed that included using government employment programs. The company also said in 1999 that it advertised skilled and upper level jobs widely using the Internet and college and university career fairs, and arranged visits and open days for prospective employees.

Chill factor and neutral workplace -The company described in the past a neutral workplace policy and ban on the display of flags or emblems. It did not allow football shirts and required sectarian tattoos to be covered. Sanmina had at the time a grievance procedure for complaints based on religion or political views. Employees could bring grievances to any supervisor or manager through either a formal or informal procedure. The policy called for the prompt, confidential investigation of all complaints and provided that all concerned were notified of the outcome. The company said it would take disciplinary action if necessary and that a report and any recommendations were forwarded to the managing director. All employees at the time had received training on sectarian harassment and intimidation in the workplace.

Some Catholics in West Belfast and areas not far from the town of Lisburn, such as the mostly Catholic housing estate of Twinbrook, say they are intimidated by Lisburn. The company said in 1999 that it was trying to overcome the chill factor by transporting employees from predominantly Catholic areas directly into the factory. It is unclear if this program is still in place.

Grievances -Four discrimination complaints have been filed against the company at the Fair Employment Tribunal since 2000, two were conciliated and two were withdrawn, one with a settlement.

Schein (Henry) Inc.

Type of Tie	equity				
MacBride Agreement	no	Underrepresentation	no	FET Discrimination Findings	0
Agreement Date	not applicable	Affirmative Action	not applicable	FET Settlements	0

• **Henry Schein K.M. Ltd.**

Location Belfast
Business dental supplies
Fair Representation No group appears to be significantly underrepresented at the company overall.
Employees 11-25 (as of July 2004)

2005 Survey Response: none

Available information: The company last responded to IRRC's fair employment survey in 2001. The company is still listed in the Northern Ireland phone book as having offices in Lisburn and Belfast and it appeared in the Equality Commission's July 2004 register of employers, indicating it has at least 11 workers; the company has fewer than 25 employees, however, as it does not appear in the commission's monitoring report. No information is available on the religious composition of the work force. The company's practices appear to be in compliance with fair employment law and the Code of Practice and unlike some other small firms, the company does use an equal employment statement in its ads. All employees are selected for promotion by merit, the company says. Selection procedures appear systematic, although all staff involved in recruitment have not been trained on EEO matters. Neither group appeared underrepresented in the company's overall work force in 2000 (the last year for which IRRC has information on the work force breakdown) when compared to a range of possible catchment areas. The company has not taken a position on the MacBride principles and told IRRC that it is unsure if its operations adhere to the principles. It also has not received a shareholder resolution on this issue--the usual route for implementation agreements. Affirmative action outreach did not appear warranted in 2001. The company's office in Belfast is easily accessible to both sides of the community. Schein said sectarian harassment and intimidation is "not tolerated in its office." No fair employment complaints have been filed against the company.

Grievances -No fair employment grievances have been filed against the company.

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Sonoco Products

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings
Agreement Date	1991	Affirmative Action	not applicable	FET Settlements
				0
				0

• Sonoco UK

Location	Lurgan, Co. Armagh
Business	converted paper tubes
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of June 2005)
	Protestant 17
	Catholic 20
	Other
	Total 37

2005 Survey Response: full

Available information: Sonoco has consistently responded to IRRC's annual surveys since 1997. IRRC met with local management at Sonoco in 1990.

Compliance with NI fair employment law and Code of Practice: The company's fair employment policies appear to be consistent with the Code of Practice.

Underrepresentation analysis: Both communities appear to be fairly represented at Sonoco. The work force is consistent with the religious composition of the Craigavon travel-to-work area and other possible catchment areas. One of two managers is a Catholic, as are 16 of 27 plant and machine operatives, which represents 73 percent of Sonoco's work force. There were no applicants or new hires during the most recent monitoring period, although Protestants and Catholics appeared roughly equal among these groups in the previous period. The company's work force has fluctuated only slightly since 1996, reaching a high of 46 in 1998 and a current low of 37 employees.

Conformance with MacBride principles: Sonoco told shareholders in 1991 that it "will continue to make lawful efforts to implement the fair employment practices embodied in the MacBride principles." The company says that it is ensuring implementation of the principles by adhering to Northern Ireland's fair employment law and reporting on its practices when information is requested.

Affirmative action outreach - No affirmative action plans appear warranted.

Chill factor and neutral workplace -The Sonoco plant is near Lurgan, on the major road between Lurgan and Portadown--southwest of Belfast. The area near the plant is generally considered to be republican, suggesting some Protestants might feel uncomfortable there. But while nearby residential neighborhoods are largely Catholic, both Sonoco Products and another U.S. firm, Teleflex (across the street), have attracted workers from both communities; there does not appear to be a significant chill factor.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

Teleflex

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	1991	Affirmative Action	yes	FET Settlements 0

- Rusch Manufacturing (UK)**

Location	Lurgan, Co. Armagh		
Business	medical devices		
Fair Representation	Protestants appear to be significantly underrepresented.		
Employees	(Data as of Feb. 2004)		
	Protestant	95	[47%]
	Catholic	107	[53%]
	Other	6	
	Total	208	

2005 Survey Response: none

Available information: Teleflex has regularly responded in full to IRRC's surveys; IRRC met with Rusch managers in Northern Ireland in 1999, 1993 and 1991. The company reported in 2004 that because of the increasingly tight labor market in Northern Ireland it hired temporary workers from Portugal, which it then hired as permanent staff. The company plans to shut down by the end of the year and move its operations to Mexico and Malaysia where labor costs are less expensive. Press reports indicate the move will cost 270 jobs in Northern Ireland.

Compliance with NI fair employment law and Code of Practice: The company appears to adhere to Northern Ireland fair employment law and its recruitment procedures appear consistent with the Code of Practice. All job openings are publicly advertised, although the company does not advertise all jobs in the three major Belfast-based dailies. It does use government job centers throughout Northern Ireland, however. It also advertises in the *Belfast Telegraph*, which it believes reaches both communities. The company also notifies all employees about positions open to internal applicants. The company uses interview panels that represent both communities for its job interviews. All those involved in candidate selection have received training on equal employment issues, and the company reviews the religious composition of applicant pools and new hires.

Underrepresentation analysis: Protestants appear to be underrepresented in the overall work force and among plant and machine operatives, who account for nearly 80 percent of the work force. An apparent underrepresentation of Protestants among clerical staff in 2003 no longer exists. Protestants also appeared to be significantly underrepresented among applicants in the 2004 monitoring period, when Catholics accounted for around 65 percent of the 86 applicants with a known religion. This figure is down slightly, however, from 66.3 percent in 2003 and down more significantly from 71.2 percent in 2002. Protestants did not appear to be underrepresented among the 22 new hires in 2004; all but one of the hires were plant and machine operatives. About half of the new hires were Catholics, a proportion that is down a little from 26 out of 40 (65 percent) in 2003 and 17 of 25 (68 percent) in 2002. The company made 10 workers redundant in 2004, including five Catholics.

Conformance with MacBride principles: Teleflex reached an agreement to implement MacBride in 1991, saying that it had been making "all possible lawful efforts toward implementation of the MacBride principles as amplified."

Affirmative action outreach - Efforts to attract more Protestants, particularly among plant and machine operatives, may be warranted. The company has not provided IRRC with any information on specific affirmative action efforts in recent years. In a successful attempt to increase the representation of Catholics in senior level jobs in earlier years, Rusch advertised upper level jobs not only in local newspapers and the *Belfast Telegraph*, but also in the *Catholic Irish News*.

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Chill factor and neutral workplace -While the Rusch plant is in a largely Catholic area, it is on a major road and appears readily accessible to both communities. Rusch and the single union now active at the plant have signed a Joint Declaration of Protection that commits management and unions to opposing workplace intimidation and protecting complainants. Rusch also organized a committee with workers to discuss a variety of issues, including equal employment, that meets every eight weeks. Sectarian harassment and intimidation is identified as a disciplinary offense in the company's employment contract, and employees have recourse to any member of management for complaints of harassment.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

Terex

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings
Agreement Date	11/02	Affirmative Action	yes	FET Settlements
				0
				2

- Finlay Hydrascreens (Omagh)**

Location	Omagh, Co. Tyrone
Business	engineering
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of Oct. 2005)
	Protestant 21 [32%]
	Catholic 44 [68%]
	Other
	Total 65

2005 Survey Response: none

Available information: Terex responded in full to IRRC's surveys between 2000 and 2002, but has not since. The company reaffirmed its support for implementing the MacBride principles in late 2005 and promised to respond to IRRC's survey, although it did not do so in time for inclusion in this report. An IRRC employee met with company representatives in Northern Ireland in 2000. Terex bought Powerscreen PLC, the former parent of Powerscreen International Distribution Ltd., in 1999, after an accounting scandal at the former parent company. September 2003 press reports indicated the Powerscreen facility had closed, making 118 employees redundant. Finlay Hydrascreens, located in Omagh, still appears to be in business. In addition, Terex's 2004 Form 10-K, filed with the Securities and Exchange Commission, indicates that the company has a variety of other companies active in Northern Ireland: Fairfield Insurance Limited, Finlay (Site Handlers) Ltd., Finlay Block Machinery Ltd., John Finlay (Engineering) Ltd., Matbro (N.I.) Ltd., Powerscreen International Distribution Ltd., Powerscreen Manufacturing Ltd. and Terex International Financial Services Co.

Aside from Finlay Block Making Equipment, which appears to be Finlay Block Machinery Ltd. listed in the 10-K, none of these other firms is registered with the Equality Commission as an employer with more than 10 workers. Equality Commission officials told IRRC that the company appears to employ most of its workers as contractors. The company told IRRC it manufactures through a system of onsite subcontractors who employ all shop floor manufacturing personnel, for which the company did not supply data. The company did not indicate how many contract workers there are at the site, nor what kind of fair employment oversight the company has over these workers. Managers, engineers, marketers and designers are direct employees of Finlay. A fair employment assessment of the company's operations is therefore made very problematic.

Compliance with NI fair employment law and Code of Practice: Powerscreen, which was managing the Finlay operations, told IRRC the facility complied with Northern Ireland fair employment law and the recommendations and legal requirements of the Code of Practice. Using materials from the Equality Commission, Finlay Hydrascreens has provided non-sectarian training for all employees, including subcontractors and their employees.

Before its closure, the human resources manager at Powerscreen International Distribution Ltd. headquarters directed the hiring process for both Powerscreen and Finlay Hydrascreens. He was also responsible for the day-to-day management of the company's equal opportunity policies, a task that is part of his job performance review. The company's general manager is ultimately responsible for progress on its affirmative action agenda.

Powerscreen said in the past that it was attempting to redress the work force imbalance at Finlay. It advertised as widely as possible, using local papers that cater to both the Catholic and Protestant communities. For management positions, the company has used the *Belfast Telegraph* and the *Sunday Life*. Additionally, the company's job advertisements have encouraged Protestants to apply. The company also has conducted outreach in schools.

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The company advertised openings internally through notice boards and email. It also tracked the success rate of applicants from both communities. When interviewing job candidates, the company said it ensured that both communities were represented on the selection panel, but it acknowledges that this was sometimes difficult given the low number of Protestant employees overall.

The company ensured that everyone involved in candidate selection had received equal opportunity training. Training for the rest of the employees was underway in 2002.

Underrepresentation analysis: The Equality Commission's data as of 2005 suggest no underrepresentation of Catholics at the company as a whole when the work force is compared to either Omagh or Omagh and nearby Dungannon. In 2002, Protestants appeared to be underrepresented at the company overall and among managers, for whom the catchment area would be all of Northern Ireland. Protestants made up 33.9 percent of the work force at the facility, and there were six Protestants out of 27 applicants; there was one Catholic out of six new hires during the 2002 monitoring period.

Conformance with MacBride principles: In 2002, an official from Powerscreen in Northern Ireland indicated the company's policies were in compliance with the MacBride principle, and said the company would continue its cooperation with IRRC's independent monitoring efforts. The company has not received any shareholder resolutions on the subject. The company reaffirmed its commitment to the principles in 2005.

Affirmative action outreach - The company has adopted an affirmative action policy developed with the help of the Equality Commission to attract Protestants. The policy outlines an overall goal of increasing Protestant representation in the work force to 40 percent, and Protestant representation among applicants and appointees to not less than 45 percent by 2003. The company views these figures as a good benchmark on which to judge the success of its affirmative action program, although it pointed out to IRRC that reaching the goals would probably require substantial new recruitment that does not appear to be in the offing. The company also has an outreach program with local schools that it hopes will contribute to an increased number of Protestant applicants.

Chill factor and neutral workplace - The company is located in rural area, near the small town of Omagh, and probably poses a chill factor for Protestants, as its immediate neighborhood is 97 percent Catholic. The wards immediately adjacent to the plant also are 80 percent Catholic. The company closes for two weeks during the summer marching season for its annual company holiday. A company official told IRRC the company schedules its holiday to coincide with marching season as it has been difficult to obtain supplies during this period. The facility prohibits "the display of flags, emblems, posters and graffiti which are likely to give offence or cause apprehension among particular groups of employees."

Grievances - Two grievances were filed at the company at the Fair Employment Tribunal in 2000 and 2001, both complaints were withdrawn following settlements in October 2003.

• **Finlay Block-Making Equipment Ltd. (60% owned)**

Location	Dungannon		
Business	concrete block manufacture		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of 2003)		
	Protestant	18	[41.9%]
	Catholic	25	[58.1%]
	Other	10	
	Total	53	

2005 Survey Response: none

Available information: The company appears to be jointly owned by Sandvik and Terex. Finlay is an industrial technology company in the concrete industry. Its employment grew steadily, reaching a high of 69 in 2001, before dropping to the present level of 53 workers as of 2003. Finlay has not responded to IRRC's inquiries.

Compliance with NI fair employment law and Code of Practice: The company did not provide IRRC with information on its fair employment practices.

Underrepresentation analysis: Neither group appears to be underrepresented when the work force is compared to either Dungannon, where the firm is located, or to Dungannon and nearby Omagh.

Conformance with MacBride principles: In December 2005 the company said it would provide information to IRRC and reiterated a former agreement to comply with the MacBride principles.

Affirmative action outreach - No affirmative action appears warranted.

Chill factor and neutral workplace -The company is located in a mixed area and employees from both communities should feel comfortable arriving and leaving the work site.

Grievances -IRRC is not aware of any complaints filed against the company at the Fair Employment Tribunal.

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TJX

Type of Tie	equity			
MacBride Agreement	no	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	not applicable	Affirmative Action	no	FET Settlements 0

• T.K. Maxx

Location	Belfast (2 stores), 7 other locations		
Business	retail clothing sales		
Fair Representation	No group appears to be significantly underrepresented at the company overall.		
Employees	(Data as of May 2005)		
	Protestant	73	[62.4%]
	Catholic	44	[37.6%]
	Other	3	
	Total	120	

2005 Survey Response: full

Available information: The company gave a complete response to IRRC's fair employment survey in 2005 for the first time since 1998, providing information on its fair employment policies and its work force.

Compliance with NI fair employment law and Code of Practice: The company says that it "operates an equal opportunities policy and the philosophy of hiring the best candidate for the job, regardless of community background or political opinion." It also maintains a Northern Ireland-specific code of conduct, with a separate policy that prohibits sectarian/political harassment. The company does not advertise all openings publicly, but it does notify all employees about positions open to them. It uses the *Belfast Telegraph*, local and regional newspapers, government job markets and the company intranet to post openings. It said no affirmative action efforts were needed to attract members of an underrepresented group. It always uses an interview panel with more than one person to screen job candidates, sometimes is able to ensure that both communities are represented on the panel, but always uses personnel with EEO training to select job candidates. It also always reviews the religious composition of applicant pools and new hires to determine success rates by community. Supervision of fair employment is the responsibility of local senior management, the district manager and U.K.-based senior management.

Underrepresentation analysis: The religious composition of the company's work force has changed substantially in the last couple of years, moving from a majority Catholic work force to a more evenly balance composition. In the past, it appeared that Protestants were underrepresented; this is no longer the case when the company's two job categories, managers and sales associates, are compared to a catchment area including all of Northern Ireland. This is the most appropriate comparison because companies typically recruit from the entire region for these positions. IRRC also compared the work force to an site-specific catchment area, taking the company's nine locations into consideration. Based on this comparison, the Catholic portion of the work force should be about 37 percent, which almost perfectly reflects the composition of T.K. Maxx's work force.

Applicants and new hires in the 2005 monitoring period were heavily Catholic (nearly 60 percent of the 1,852 applicants with known religion were Catholics, while Catholics accounted for 57 percent of the 277 new hires). But these figures could be wholly justified depending on the locations that had openings during the year.

Conformance with MacBride principles: The company has not reached an agreement with shareholder proponents on the MacBride principles, although it told the SEC that it "essentially complies with the practices outlined in the MacBride principles." In its 2005 survey response, the company says that instead of adopting the MacBride principles, it follows the "code of conduct and guidelines laid down by the Equality Commission of Northern Ireland. We have a robust recruitment and selection process, which determines the best person for the job and we have credibility in the local marketplace as being an Equal Opportunity Employer." TJX has said in its proxy statement that adopting the principles could produce "divisiveness in the workplace." Votes on shareholder resolutions asking the company to implement the MacBride principles have dropped from previous

levels near 20 percent. In 2004, investors gave only 9.3 percent support to a shareholder resolution asking for MacBride implementation, making the proposal ineligible for resubmission until 2007.

The company says the principles are aimed at anti-Catholic discrimination and that implementing them actually could lead to a decrease in the number of Catholic employees at T.K. Maxx, negating this aim. This is a view that was shared for some time by Interface, another U.S. firm that had an overrepresentation of Catholics and regularly received shareholder resolutions on the issue until it reached an agreement with activists in 2001. The principles themselves do not single out Catholics or Protestants for special consideration, but refer to a need for affirmative action for "underrepresented religious groups." Fair employment law in Northern Ireland requires affirmative action if either Catholics or Protestants are underrepresented compared to reasonable catchment areas. The wording of the principles suggests the same obligation, although it is clear the principles were initiated because of concerns over anti-Catholic discrimination.

Affirmative action outreach - No affirmative action measures appear to be warranted based on the current work force breakdown. The T.K. Maxx policy described to IRRC in the past said the company would adopt, "where necessary appropriate affirmative action measures to ensure the provision of equality of opportunity and fair participation for all sections of the community."

Chill factor and neutral workplace - TJX has eight T.K. Maxx stores in Northern Ireland; the location of the store in central Belfast would not pose a chill factor for either community. It is not clear if any of the other locations would pose a problem for employees traveling to work; however, Newtownabbey is predominantly Protestant, Craigavon is close to some heavily Protestant areas, and some Catholics have said they feel intimidated by the Lisburn area. By contrast, Newry is predominantly Catholic. The company's work force is not unionized, but T.K. Maxx said in the past that it had incorporated "the spirit and substance" of the Confederation of British Industries' Joint Declaration of Protection into its fair employment policy. All employees must sign the policy. The company said "good and harmonious working environments" described by the CBI are important to us," and notes sectarian materials are specifically prohibited. Sectarianism "is rated as a serious breach of discipline and would be treated within disciplinary procedures" and could warrant dismissal. The company's policy said "every employee has the right to work free from intimidation or harassment on the grounds of religious belief or political opinion," and employees and management condemn sectarianism and "commit themselves to take all reasonable steps" to keep it out of the workplace. The policy also said complainants "are ensured prompt investigation, without risk of victimization, and, where justified, remedial action." T.K. Maxx said it would ensure employees were not victimized if they lodged a complaint of discrimination.

Grievances -No discrimination complaints have been lodged against the company at the FET.

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United Technologies

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	yes	FET Discrimination Findings 0
Agreement Date	1/01	Affirmative Action	yes	FET Settlements 0

• Otis Elevator

Location	Belfast
Business	elevator sales, service, repair and installation
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of April 2005)
	Protestant 31
	Catholic 16
	Other 2
	<hr/> Total 49

2005 Survey Response: full

Available information: Otis Elevator has consistently responded to IRRC's annual survey since 1997.

Compliance with NI fair employment law and Code of Practice: Personnel procedures at Otis appear to be in line with the Code in hiring procedures and workplace standards regarding fair employment. Promotion and training programs are based on analyses of performance, the company said, as well as on business and individual needs. Job advertisements are placed in the *Belfast Telegraph* and *Irish News* and include an EEO statement. The company always notifies all employees about positions open to internal applicants. Structured interviews use two-person panels and allow only pre-determined questions related to job criteria. The company says both communities always are represented on interview panels. All employees involved in candidate selection receive equal employment training, and the company provides all management and supervisors with in-house equal opportunities training, using materials from the Equality Commission. Layoff procedures are not conducted on a last-in, first-out basis, but use performance, service, attendance and disciplinary records. The branch manager, overseen by the service operations director and audited by the personnel department, is responsible for fair employment matters.

Underrepresentation analysis: In assessing Otis, IRRC used a weighted catchment area that considers all of Northern Ireland for upper level employees and the Belfast travel-to-work area for skilled employees, who make up around 80 percent of the work force. No underrepresentation is apparent for the company as a whole or within individual job categories when the work force is compared to the subsequent weighted catchment area that is about 34 percent Catholic.

During the last three monitoring periods, the company hired only five people. In 2005, Protestant and Catholic representation among applicants was split about evenly. In 2004, it let go nine workers, including six Protestants and three Catholics. The company says it has had difficulties finding skilled Catholic lift engineers with prior experience, but it is addressing this issue through an engineering apprentice program.

Conformance with MacBride principles: The company reached an accord on MacBride implementation with activists in 2001, following negotiations on a shareholder resolution that was withdrawn. The company had opposed shareholder resolutions on the subject in 2000, 1999 and 1994. Until passage of new fair employment legislation for Northern Ireland in December 1998, Otis had said the MacBride principles would be illegal under U.K. law. The company said the principles would require the use of quotas in staff recruitment, an assumption that MacBride advocates continue to refute.

Affirmative action outreach - No affirmative action measures appear warranted.

Chill factor and neutral workplace -In 2000, the company signed a Joint Declaration of Protection with the Amalgamated Engineering and Electrical Union to ensure a neutral workplace. Management, supervisors and

trade union members have completed Equality Commission training on equitable recruitment and sectarian harassment prevention.

The Otis office is in the neutral Belfast city center. The company says sectarian materials are "strictly prohibited." Field personnel travel in unmarked vans when appropriate. During the summer "marching season," staff are allowed flexible hours to avoid parades. While roadblocks sometimes have caused some delays for employees commuting to work, the company says it "is always open for normal office hours during the marching season and there has been no measurable effect on business results during this period."

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal. Otis says its harassment policy specifically outlines steps a complainant may take to file a grievance. Provision will be made for complaints to be taken to "independent human resources staff."

- **Toshiba Carrier UK**

(85% owned)

Location	Belfast
Business	air conditioning/refrig. installation & maintenance
Employees	9 (as of November 2005)

2005 Survey Response: full

Available information: Toshiba Carrier reported to IRRC for the first time in 2000, and has responded in full every year since. Employment at the company has remained steady for the last several years, it currently employs nine workers.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to Northern Ireland fair employment law and the Code of Practice and it provided a copy of its amended equal opportunity policy. Job advertisement, hiring and neutral workplace policies appear to be consistent with good practices recommended by fair employment experts in Northern Ireland. Employees involved in personnel decisions have all received training on EEO matters.

UTC says that it is "very concerned that it is seen as and operates as an Equal Employment Opportunity employer." . The company also says that it "issues a welcoming statement and EEO statement in ads concerning vacancies" and that "whoever applies for a job is judged and appointed on merit and not any other consideration." In 2001, Toshiba Carrier adopted a new EEO policy that the new human resources director drafted based on the MacBride principles and U.K. legislation. This has been regularly updated and circulated to all employees and is included in all new employee orientation packs. IT is displayed on every notice board and is on the company intranet.

Underrepresentation analysis: The company's work force is heavily Protestant, although it is difficult to draw conclusions about underrepresentation given the small size of the firm. The company has hired one person in the last year, and its work force has increased from eight to nine employees.

Conformance with MacBride principles: The company reached an accord on MacBride implementation with activists in 2001, following negotiations on a shareholder resolution that was withdrawn. The company had opposed shareholder resolutions on the subject in 2000, 1999 and 1994.

Affirmative action outreach - The company's small size makes it impossible to draw conclusions about the community representation in its work force. Even so, UT reports that "Toshiba Carrier UK has adopted a variety of job advertisements and candidate attraction techniques in order to redress the balance."

Chill factor and neutral workplace -The company says, "We are aware that the office is not in a politically neutral location. We are looking to move premises and have identified a property in a neutral area. However, as part of a large corporation we are now waiting on appropriate approvals. We hope to move forward on this and also that the move will enable us to attract a more evenly balanced work population."

Grievances -No complaints have been filed against Toshiba Carrier at the Fair Employment Tribunal.

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- **UTC Fire and Security**

Location	Belfast		
Business	security and fire protection systems		
Fair Representation	Catholics appear to be significantly underrepresented.		
Employees	(Data as of Feb. 2005)		
	Protestant	92	[80%]
	Catholic	23	[20%]
	Other	2	
	Total	117	

2005 Survey Response: full

Available information: United Technologies acquired Chubb, a spin-off of the former Williams PLC, in 2003. It provides electronic security systems, fire protection systems, security guards and security system monitoring. Chubb has since changed its name to UTC Fire and Security. Its operations are headquartered in Dublin and company representatives told IRRC in a meeting held in 2005 that all policies and activities are run on an all island basis. UTC Fire and Security's only Northern Ireland site is located in Belfast. Since UT's acquisition, the company has consistently responded to IRRC's annual survey. Company representatives believe sustained peace in Northern Ireland will allow for increased investment and in turn increased demand for its products.

Compliance with NI fair employment law and Code of Practice: UTC Fire and Security believes its Northern Ireland operations adhere to the fair employment law. The company reported that it used IRRC's 2004 profile to help revise its Equal Opportunities Policy to "encompass all aspects [for the] elimination of discrimination including specific mention to political and religious beliefs." It changed its hiring and selection processes to ensure all interviewers have received EEO training. It also makes "every effort" to have representation from both communities on interview panel, but admits "this cannot always be achieved due to the small number of employees available to sit on such panels."

UTC Fire and Security publicly advertises all job openings and posts internal openings to notify all employees. An EEO statement is included in its ads, which are usually run in the Belfast Telegraph and the Irish News as well as other local and regional papers. The company also uses job markets in particular areas to attract candidates from underrepresented groups, presumably Catholics. Even though new hires have been almost 90 percent Protestant, the company says it always reviews the religious composition of applicant pools and new hires to determine success rates by community. According to the company, a European Union requirement makes it more difficult for UTC Fire and Security to regulate its hiring practices since workers who are under a contract are protected in the event another company takes over the job. For example, if UTC Fire and Security takes over a contract to maintain security guards at a bank, the guards that were already working the job have rights to keep those positions. In such a case, UTC Fire and Security would then "adopt" the employees as "dismissals are only permitted if they are for technical, organizational or economic reasons." As the company explains, "the overall effect of this EU regulation is that companies who provide a service such as cleaning, security, catering tend to have a movement of employee population on contract wins/losses."

Company officials said these regulations are likely to change along with "new standards and practices in licensing and regulation of the security industry." Local management previously oversaw recruitment, but UTC Fire and Security has hired a recruitment officer for the Belfast office who reports directly to the human resources department in Dublin.

All employees participate in the job task specific training. The company also has an employee scholar program, which "pays all expenses for higher education, provides paid time off for study and provides awards of company stock upon degree attainment." The human resources team is responsible for ensuring equal opportunities and senior management at UTC Fire and Security ensure compliance at the operational level.

Underrepresentation analysis: Catholics appear to be underrepresented in the company's work force overall when it is compared to a weighted catchment area that compares Northern Ireland as a whole to managers, professionals, skilled workers, and sales representatives and the Belfast travel-to-work area to all other employees. Specifically, Catholics appear to be underrepresented among clerical staff (the 17 workers in this category are

heavily Protestant) and among miscellaneous low-skill level employees (there are 10 Catholics among 63 with identified religion). Catholic representation has dropped substantially since 2001, and most steeply between 2001 and 2002, when the percentage of Catholics fell from 37 percent to 19 percent, a reflection of a 20 percent drop in the total work force. Catholic representation continued to slip in 2004, reaching less than 17 percent as the work force shrunk by 9 employees. Catholic representation has nudged up to just over 18 percent in the most recent monitoring period and the work force has grown to 132.

The vast majority of hires in the last few years have been Protestants even though Catholics have been continually underrepresented. In the past two monitoring periods, 23 of the 61 new hires were Protestants.

The root of the problem appears to be that the company is simply not attracting many Catholic applicants: they accounted for only 41 out of 200 candidates in the last two years. These statistics show the hiring rate among Catholics is much higher than among Protestants, however to reflect fair representation, UTC Fire and Security would have to hire about 20 additional Catholic employees. The company said in its 2004 IRRC survey response that its location in a predominantly Protestant neighborhood should dictate that the correct Catholic catchment area is 10 percent. While it is true that the company's offices are close to the heavily Protestant enclaves of North Belfast, they are also just off one of the main motorways in Belfast and should be easily accessible by members of either community. Fair employment experts, including those at the Equality Commission, routinely suggest that Belfast-based employers should compare their work forces to much broader areas than just their immediate neighborhoods, although these neighborhoods may have a clear impact on chill factor. The Belfast district council area, arguably the best comparison for many of the company's employees, is 49 percent Catholic and the Belfast travel-to-work area is 33 percent Catholic. Clearly, the company has an obligation to initiate affirmative action measures under the Northern Ireland fair employment law and from the perspective of the MacBride principles.

The company provides security and fire protection systems to its customers. It is the case that the security industry in Northern Ireland has been heavily Protestant over the years, and that the substantial reduction in security-related jobs and in the police force in the last several years--given the enduring paramilitary ceasefires and the continued peace talks--has put many qualified Protestant workers in the profession out of work. This could well affect the community breakdown of the potential applicant pool for UTC Fire and Security, and make it heavily Protestant. These developments do not vitiate the company's affirmative action obligations, however.

Conformance with MacBride principles: UTC Fire and Security said it will incorporate the MacBride principles into its policies by this year and it has submitted a copy of its EEO policy to IRRC. Its policies state it will "remain committed to the achievement of equal opportunities within all our activities and responsibilities." It specifically mentions religious and political persuasion as well as sexual orientation, age, race and language in its EEO policy. In the past, the company said it planned to make changes to its policies to reflect MacBride principles two and three, which relate to security for workers and banning provocative emblems in the workplace. In 2005, company representatives told IRRC that emblems have been disallowed from the workplace. United Technologies' other companies have successfully implemented the MacBride principles and since the acquisition UTC Fire and Security has significantly restructured its operations to coincide with UT guidelines. UTC Fire and Security representative told IRRC that implementing the MacBride principals and fair employment regulations became a priority this year. They expect next year's survey response to reflect their attention in this area.

Affirmative action outreach - In the past, UTC Fire and Security has told IRRC that while it recognizes the need to pursue affirmative actions and plans to seek guidance from its other member companies and the Equality Commission and change its policies in 2005, management had been occupied with integrating the company into UTC's other operations. It said it will "endeavor to expands its recruiting efforts more aggressively for underrepresented groups." Company representatives told IRRC in 2005 that its goal is to increase the Catholic percentage of the work force by a few percentage points by June 2006.

As of the 2005 monitoring period, UTC Fire and Security has not worked with the Equality Commission to develop or implement an affirmative action plan to increase the representation of Catholics in its work force. It did begin advertising in the *Irish News* in 2005 to "attract a greater number of applicants from this readership," which are a majority Catholic. Company representatives are considering options to increase the number of Catholic security guards, the employment category that accounts for nearly half of the work force and reflects the

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most significant underrepresentation. Its affirmative action plan would have to be unique because, as mentioned, the company inherits many workers and loses others as a result of EU regulations. To correct underrepresentation in the work force, UTC Fire and Security needs to bid for jobs that are run by predominately Catholic guards. It is considering offering an additional financial incentive to its sales employees who obtain contracts in predominately Catholic areas with the intention that geographical targeting could lead to a boost in the Catholic portion of the work force.

Chill factor and neutral workplace -The company's offices are in an industrial park north of downtown Belfast, just off a main motorway, and should not pose a substantial chill factor to either community, although they are close to heavily Protestant neighborhoods. To negate any chill factor, employees can relay security concerns to senior management or to a human resources hotline, the company told IRRC. The office uses closed circuit TV monitoring for security. Managers and supervisors receive workshops or training on sectarian harassment and intimidation in the workplace, using materials from the Equality Commission. The company reports that it has an "open door policy of communication" and references its numerous programs through which concerns can be addressed: HR Hotline, Dialog Programme, Ombudsman Programme, Development Training, annual employee surveys and strong relationship with union representatives. The crown emblems that were affixed to UTC Fire and Security fire extinguishers were recently removed.

Grievances -No fair employment grievances have been filed against the company in recent years.

UTC Fire and Security and the trade union representing its workers have developed to 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 provide a confidential and secure environment for employees to raise complaints. UTC Fire and Security's general policy includes equal access to employment regardless of race, gender, sexual orientation, language, or religious or political persuasion.

Watson Pharmaceuticals

Type of Tie	equity			
MacBride Agreement	yes	Underrepresentation	no	FET Discrimination Findings 0
Agreement Date	1/02	Affirmative Action	not applicable	FET Settlements 0

• Nicobrand

Location	Coleraine
Business	bulk chemical processing
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of Dec. 2004)
	Protestant 16
	Catholic 8
	Other 3
	Total 27

2005 Survey Response: full

Available information: Nicobrand has completed the IRRC annual survey consistently since 2002. In April 2004, the company received the top U.K. business award, the prestigious Queen's Award for Enterprise. IRRC first became aware of the company's presence in Northern Ireland through press reports in 2001. The company has a 10,000 square foot bulk chemical processing facility in Coleraine. The company's work force has been about the same size since 2003.

Compliance with NI fair employment law and Code of Practice: The company says that it complies with Northern Ireland fair employment law and the recommendations and legal requirements of the Code of Practice. The company publicly advertises all job openings and always notifies employees about positions open to internal applicants. It advertises in *The Belfast Telegraph*, as well as local and regional newspapers, job markets and trade publications. The company always uses an interview panel on which both communities are represented. All those involved in candidate selection have received training on equal employment, and the company reviews applicant success rates by religion. The company uses materials from the Equality Commission to conduct workshops for managers and supervisors on sectarian harassment and intimidation in the workplace. Senior management oversees equal employment programs.

Underrepresentation analysis: There does not appear to be any underrepresentation at the company overall or in any particular job category. The number of employees who identify themselves as Catholic has dropped from 12 in 2003 to eight, and five of 16 new hires since 2003 were Catholics.

Conformance with MacBride principles: The company reached a MacBride implementation agreement in 2002, which prompted the New York City pension funds to withdraw a shareholder resolution on the subject.

Affirmative action outreach - No affirmative action efforts currently appear warranted, although the company includes an EEO statement in its ads and uses job markets in particular areas to achieve appropriate representation of both communities.

Chill factor and neutral workplace -IRRC is unaware of any outstanding concerns on this issue at Nicobrand. Members of both communities should feel comfortable in Coleraine, which is a relatively mixed area.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal. The company provided IRRC with a brief description of its grievance policy in 2005. The policy says employees may raise issues with their manager and that any concerns will be "investigated fully." The policy also promises notification of a decision within 10 working days and the right to appeal.

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Yum Brands

Type of Tie	franchise				
MacBride Agreement	no	Underrepresentation	unknown	FET Discrimination Findings	0
Agreement Date	not applicable	Affirmative Action	unknown	FET Settlements	1

• Herbal Restaurants

Location	province-wide
Business	KFC fast-food restaurants
Fair Representation	No group appears to be significantly underrepresented at the company overall.
Employees	(Data as of 2003)
	Protestant 280 [56.6%]
	Catholic 215 [43.4%]
	Other 25
	Total 520

2005 Survey Response: none

Available information: Yum Yum has declined to respond to IRRC's fair employment survey and has said only that its franchisee follows Northern Ireland fair employment law. Most recently, the company said in its 2005 proxy statement that its franchise businesses in the region are already required by law to adhere to the Fair Employment & Treatment (NI) Order 1998, and adoption of the MacBride principles would only result in "additional and overlapping obligations." Yum Brands initially told IRRC in a 2002 email that it would provide information on the company's policies in Northern Ireland, but it never did. Information on the overall work force composition of Herbal Restaurants is available from the Equality Commission. IRRC interviewed a broad range of sources in Northern Ireland in 2002 about Kentucky Fried Chicken outlets in the province and related fair employment issues. Some information on sectarian problems at the chain also is available from press reports. Equality Commission staff in Belfast have told IRRC that Herbal Restaurants has taken some action recently to reform its fair employment practices.

There are 10 KFC locations in Belfast, two locations in Lisburn, and one each in Antrim, Bangor, Carrickfergus, Coleraine, Craigavon, Dungannon, Enniskillen, Limavady, Magherafelt, Newcastle, Newry, Newtownabbey, Newtownards, Omagh, Portrush and Strabane.

KFC opened its first U.K. outlet in 1965 and since 2000 has been expanding rapidly. It employs about 10,000 people at more than 520 outlets in England, Scotland and Northern Ireland. A private Belfast firm, Herbal Restaurants, holds the Northern Ireland KFC franchise, operating 38 outlets around the province; 26 are listed on the KFC website.

Significant unanswered questions exist about fair employment matters at Yum Brands' operations in Northern Ireland, more than three 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 to IRRC 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 a time. 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 told IRRC 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 NI fair employment law and Code of Practice: Yum Brands provided no information about the fair employment policies of Herbal Restaurants. A separate inquiry directed to Herbal 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: Neither Catholics nor Protestants are significantly underrepresented when the work force of Herbal Restaurants is compared to the economically active population of Northern Ireland, which as of 2001 was 42.4 percent Catholic. No information is available on the work force composition at individual KFC outlets. The location of these outlets and the composition of their local recruitment areas could change the overall analysis significantly, but further information to conduct such an analysis would have to come from the company.

Conformance with MacBride principles: A shareholder resolution asking for MacBride implementation at Yum Brands in 2005 received 14.7 percent support, up from 13.4 percent in 2004 and 12.1 percent in 2003. Yum Brands opposed the proposal, saying that the MacBride principles are superceded by Northern Ireland's fair employment law, and that it cannot force Herbal Restaurants to comply with the principles because they have no legal force in Northern Ireland.

Affirmative action outreach - No information is available on any affirmative action efforts the company may be making.

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, are reported to have received death threats from loyalist paramilitary groups in the early years of this 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 Herbal 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 -No fair employment grievances have been filed against the company in recent years.

- **Pizza Hut (UK)**

Location	nine locations province-wide
Business	pizza
Fair Representation	Insufficient data are available to determine if any group is significantly underrepresented.
Employees	approx. 50 (as of 2005)

2005 Survey Response: none

Available information: There are two Pizza Hut restaurants operating under the business name, Pizza Hut (UK) Ltd., in Dungannon and Ballymena. Seven Pizza Hut restaurants are operating under the business name Pizza Hut (Ireland), in Belfast, Lisburn and Carrickfergus. IRRC is not aware of any fair employment problems that have surfaced at these restaurants, which appear to be operated separately from the KFCs. No information is available about the number of employees at the Pizza Huts, or about fair employment policies there. IRRC estimates that the restaurants employ at least 50 people, and probably more.

Grievances -No fair employment grievances have been filed against the company.