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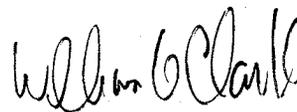
REPORT TO THE GOVERNOR
AND THE LEGISLATURE AS
REQUIRED BY
P.L. 1987, c.177
(Report on corporations
doing business in Northern Ireland
whose securities are held by the State
pension funds)

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

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

We utilize Institutional Shareholders Services (ISS) as the source of information to identify those United States corporations doing business in Northern Ireland and to provide reports on their adherence to the principles set forth in the law.

Attached hereto as Exhibit I is the report prepared by ISS, dated December 2006.



William G. Clark
Director

WGC:lt
Attachments

EXHIBIT I

**U.S. COMPANIES IN WHICH THE DIVISION INVESTS THAT
DO BUSINESS IN NORTHERN IRELAND**

3M Co.	Goodrich Corp.
Abbott Laboratories	Hewlett-Packard Co.
AES Corp.	IAC/Interactive Corp
Alcoa Inc.	International Business Machines Corp.
Allstate Corp.	Marsh & McLennan Companies, Inc.
Aon Corp.	McDonald's Corp.
AVX Corp.	Merck & Co., Inc.
Baker Hughes Inc.	Microsoft Corp.
Bemis Co., Inc.	Nacco Industries, Inc.
Berkshire Hathaway Inc.	Omnicom Group Inc.
Blockbuster Inc.	Openwave Systems Inc.
Borland Software Corp.	PepsiCo, Inc.
Caterpillar Inc.	Pfizer Inc.
Chevron Corp.	Raytheon Co.
Citigroup Inc.	Sanmina-SCI Corp.
Claire's Stores, Inc.	Schein (Henry) Inc.
Clear Channel Communications, Inc.	Sonoco Products Co.
Coca-Cola Co.	Starbucks Corp.
Computer Sciences Corp.	Terex Corp.
Crane Co.	TJX Companies, Inc.
Crawford & Company	United Technologies Corp.
Danaher Corp.	Vornado Realty Trust
DuPont (E.I.) de Nemours & Co.	Wal-Mart Stores, Inc.
Emerson Electric Co.	Watson Pharmaceuticals, Inc.
General Electric Co.	Yum! Brands, Inc.



INSTITUTIONAL SHAREHOLDER SERVICES

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

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

December 2006

By Heidi J. Welsh and Maureen O'Brien

Institutional Shareholder Services

Washington, D.C.

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, 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, although no conclusions are drawn from a work force with fewer than 30 employees. Subheadings in the remainder of each profile indicate:

- the extent of the company's response to the Northern Ireland Service 2006 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 since 2003.

The profiles refer to two government agencies in Northern Ireland:

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

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Table of Contents

3M	4
Abbott Laboratories.....	6
AES	7
Alcoa	9
Allstate	11
Aon Corp.....	14
AVX	16
Baker Hughes	18
Bemis.....	21
Berkshire Hathaway	24
Blockbuster.....	26
Borland Software.....	28
Caterpillar.....	29
Chevron	32
Citigroup.....	33
Claire's Stores	35
Clear Channel Communications	37
Coca-Cola Co.	38
Computer Sciences	41
Crane	43
Crawford.....	45
Danaher	47
DuPont (E.I.) de Nemours	49
Emerson Electric	51
General Electric.....	53
Goodrich.....	57
Hewlett-Packard	59
IAC/Interactive	61
International Business Machines	62
Marsh & McLennan	63
McDonald's.....	67
Merck	74
Microsoft.....	75
Nacco Industries.....	77
Omnicom Group.....	79
Openwave Systems	80
PepsiCo	82
Pfizer	84
Raytheon.....	86
Sanmina-SCI.....	88
Schein (Henry) Inc.	89
Sonoco Products.....	90
Starbucks Corp.	91
Terex	93
TJX.....	96
United Technologies.....	98
Vornado Realty Trust.....	104
Wal-Mart Stores Inc.	106
Watson Pharmaceuticals.....	108
Yum Brands.....	110

3M

MacBride Agreement	Yes	Underrepresentation	Maybe	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 slightly underrepresented				
Employees	(Data as of Sept. 2006)				
	Protestant	138		87%	
	Catholic	20		13%	
	Other	4			
	<hr/>				
	Total	162			

2006 Survey Response: full

Available information: 3M company manufactures adhesive tape at its Bangor location in County Down. It has cooperated with the Northern Ireland Service, completing surveys and providing access to local managers for interviews several times. Company officials also have periodically met with Northern Ireland Service staff 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 12 employees since 2003, and its staff now numbers 162 workers.

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: In previous years, Catholics appeared to be underrepresented in the overall work force and especially among machine operatives. Data from the most recent monitoring period show only a slight Catholic underrepresentation--an improvement towards fair representation of both communities.

In 2005 and 2004, 3M's work force grew while Catholic representation fell. Catholics appeared to be underrepresented overall and specifically among plant and machine operatives, who comprised about 7 percent of the work force. The company is in a predominately Protestant area and applicants are consistently more heavily Protestant, although in this monitoring period neither community appeared underrepresented among applicants.

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, which hit a high in 1999 of 14 percent. The Northern Ireland Service analysis assumes that all of Northern Ireland is the appropriate catchment area for management, professional and sales jobs, and the catchment area for North Down and Ards is used to weight the employment categories of associate professionals, administrative staff and elementary occupations.

A more narrow catchment area, North Down, is appropriate for the largest employee category--plant and machine operatives. Nearly 70 percent of workers with identified religion are machine operatives and almost 95 percent of employees are from Down.

3M reached an affirmative action agreement with the Equality Commission, which included a target of increasing the Catholic proportion of applicants and appointees to at least 11 percent by 1999, and an overall goal of increasing the Catholic proportion of its manual work force to 11 percent. 3M met these goals and generally has exceeded its target for Catholic applicants. Catholic applicant levels were higher in the late 1990s, but the company told the Northern Ireland Service that vacancies in those years were for highly paid, skilled positions for which candidates would be willing to travel, attracting applicants from areas with more Catholics than its immediate vicinity.

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." The company regularly complies with monitoring by the Northern Ireland Service.

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: The Northern Ireland Service is not aware of any complaints filed against the company at the Fair Employment Tribunal.

Abbott Laboratories

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	6/01	Affirmative Action	NA	FET Settlements	1

- **Abbott Laboratories Ltd.**

Location	employees work from home
Business	pharmaceutical, health care and diagnostic products
Fair Representation	Neither community appears to be underrepresented
Employees	(Data as of Nov. 2005)
	Total 9

2006 Survey Response: full

Available information: Abbott Laboratories regularly responds to the Northern Ireland Service survey. Employment has been falling in the last several years. In 2002, it employed 16 workers, 11 in 2005 and nine as of the most recent monitoring period. Abbott employees in Northern Ireland work from home and 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," according to a company representative. 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: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

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 the Northern Ireland Service annual survey. It therefore meets the conditions of MacBride implementation agreements.

Affirmative action outreach: No affirmative action measures are warranted. 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 settled a complaint of wrongful selection for redundancy in 2006. A company representative said the decision to settle "was a sensible financial solution for all concerned and Abbott still maintains that the case was unfounded."

AES

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	4/96	Affirmative Action	Yes	FET Settlements	0

• **AES Kilroot Power**

Location	Carrickfergus				
Business	electricity generation				
Fair Representation	Catholics appear to be underrepresented				
Employees	(Data as of May 2006)				
	Protestant	81		88%	
	Catholic	11		12%	
	Other	1			
	<hr/>				
	Total	93			

2006 Survey Response: full

Available information: AES owns more than 97 percent of AES Kilroot Power Ltd.; employees own the rest. The coal-burning Kilroot Power station is being updated with pollution control equipment to bring it into compliance with EU standards on sulphur dioxide and nitrous oxide emissions. The update will cost rate-payers £45 million and the move is being fought by the Northern Ireland Authority for Energy Regulation. Those opposed to the renovations argued that consumers should not have to pay to keep antiquated forms of energy running. The Department of Enterprise, Trade and Investment in Northern Ireland has urged the company to develop renewable technologies at the plant in addition to its traditional operations.

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 the Northern Ireland Service surveys every year since 1997, except in 2003; management met with Northern Ireland Service staff 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. (The work force slightly increased in 2006 but it is half the size of its work force in 1999.) The company used to advertise jobs in a range of newspapers, ensuring widespread notice of job vacancies, but in its most recent survey response the company reported that it advertises in the Belfast Telegraph. It also reported that jobs are sometimes advertised internally and throughout the AES Corporation. The company uses an interview panel when selecting new hires, but it does not guarantee that both communities are represented on the panel.

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. Northern Ireland senior management oversee the company's equality policy.

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, but has fallen back to 12 percent in the most recent monitoring period. The company reported no redundancies, applicants or new hires in 2005. In 2006, the five new hires were heavily Protestant. The company's main problem appears to be its inability to attract Catholic applicants. In 2006, records show only 13 percent of applicants whose religion is identified were Catholics.

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 has done minimal recruiting in the last several years. 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, particularly 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 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: No recent complaints have been filed against the company at the Fair Employment Tribunal. The company's grievance policy allows employees to file complaints confidentially and to raise issues with someone other than their immediate supervisor.

Alcoa

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

• Aluminum Supply Aerospace

Location	Newtownards				
Business	metal supplies				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of Aug. 2006)				
	Total	22			

2006 Survey Response: full

Available information: For several years, Alcoa has provided a complete survey response for Aluminum Supply Aerospace (ASA), a division of as subsidiary, British Aluminum 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 its responses to the Northern Ireland Service 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 as well as other local newspapers, the Internet, the company intranet, 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. The company seeks to have cross-community representation on the interview when it is possible. 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 U.K. management is responsible for fair employment matters in Northern Ireland.

Underrepresentation analysis: The Northern Ireland Service does not statistically assess the work force at companies with fewer than 30 employees. However, ASA's work force is overwhelmingly Protestants and the company has a clear affirmative action responsibility to boost the Catholic portion of its work force. In the most recent monitoring period, both the applicants and new hires were also overwhelmingly Protestant. The company appears to have a problem attracting Catholic applicants. In 2005, 99 percent of the applicants were Protestants, and new hires were heavily Protestant. ASA reported that 80 percent of its employees live in North Down and Ards Borough Councils; both are predominantly Protestant areas. The company has also reported that it finds a 12 percent Catholic representation to be an appropriate catchment figure, but this is much lower than the 33 percent figure used by the Equality Commission for the Belfast travel-to-work area.

Conformance with MacBride principles: Alcoa, which has a MacBride agreement, says that it is compliant with the principles and it has consistently responded to the Northern Ireland Service survey. While some companies argue that it is not possible to ensure safety for employees while traveling to and from work, Alcoa reported that its policy is to make sure employees have a safe parking facility at the workplace that is surrounded by a fence and has only one entrance point.

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 has previously told the Northern Ireland Service, "we also feel that there should be recognition of the limitations for corrective action." The

department manager facilitates all training for 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."

Chill factor and neutral workplace: The company is located in a predominately Protestant area, which could pose a chill factor for Catholics. Management 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 the Northern Ireland Service 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. Employees can also raise issues with someone other than their immediate supervisor if they feel more comfortable. No grievances have been filed against the company at the Fair Employment Tribunal.

Allstate

MacBride Agreement	Yes	Underrepresentation	Maybe	FET Discrimination Findings	0
Agreement Date	11/00	Affirmative Action	No	FET Settlements	0

• **Northbrook Technology of NI Ltd.**

Location	Belfast, Derry, Strabane			
Business	Call centers, IT services			
Fair Representation	Protestants appear to be underrepresented			
Employees	(Data as of Sept. 2006)			
	Protestant	515		38%
	Catholic	824		62%
	Other	219		
	Total	1558		

2006 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 1,558 full-time workers. 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 to produce 260 jobs. The Strabane facility current employs 320 workers. The company has regularly responds to monitoring by the Northern Ireland Service and Service staff meet with company representative in 2005.

Compliance with NI fair employment law and Code of Practice: The company's policies 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. Human resources managers say that Northbrook 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, the company first advertises internally if the position requires special knowledge, then places ads externally. A team of employees reviews the resumes and creates a short list of candidates, who then must take an aptitude test to qualify for an interview. All candidates face a panel of interviewers who represent both communities. 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. Company representatives have said 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. In June 2006, it won an award for its Diversity and Equality Programme.

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 well as from the Republic of Ireland because both locations are in close proximity to the border. The Northern Ireland Service 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, customer service representatives and overall.

The company reported that it considers the eastern side of Northern Ireland to be an appropriate catchment area for the Belfast office and it said the balance of applicants and employees come from the western end, noting that the area "includes a number of border counties with a considerably higher representation of Catholics in the local population." For the Belfast office, Northbrook recruits from local college graduates, of which, says Northbrook, "65 percent are Catholics." This would help to explain why Protestants are underrepresented in the work force.

Strabane and Derry figures also reflect significant underrepresentation, although both communities appear fairly represented in Derry when the catchment area is more narrowly defined by the district council area's unemployed population; a fair assessment given Northbrook's recruitment efforts with the actively unemployed in Derry and Strabane. The company's efforts in this capacity are ground breaking; it conducts mock interviews and provides resume training to help applicants prepare for potential opportunities. Significant portions of these applicants are third generation unemployed.

The company says the jobs at the Strabane site are lower level and unskilled positions, which are filled by staff who walk to work. This would create a much narrower catchment area that may not show any Protestant underrepresentation. Applicant and new hire figures in the last few years show an increase in the proportion of Protestants, but have remained heavily Catholic. The company reports 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. About 16 percent of the work force in Derry and 18 percent in Strabane are not identified as belonging to a community, which is a much larger share of the staff than the 10 percent of employees in Belfast whose community is not identified.

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 monitoring by the Northern Ireland Service.

Affirmative action outreach: Data suggests that Northbrook is obligated to try to attract more Protestant applicants. Northbrook disagrees. 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. The company advertises in local papers that reach both communities for job openings at the Strabane and Derry sites. In Strabane, the company also utilizes a local job center that posts advertisements online.

Chill factor and neutral workplace: Northbrook Technology has three locations in Northern Ireland, Belfast, Londonderry and Strabane. 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. The company's offices in Derry will be on the more heavily Catholic "city side" 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: The Northern Ireland Service is unaware of any complaints filed against the company at the Fair Employment Tribunal.

Aon Corp.

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	1991	Affirmative Action	No	FET Settlements	0

• **Aon McMillen**

Location	Belfast				
Business	insurance broking/investment				
Fair Representation	Catholics appear to be underrepresented				
Employees	(Data as of Feb. 2006)				
	Protestant	44		88%	
	Catholic	6		12%	
	Other	6			
	<hr/>				
	Total	56			

2006 Survey Response: full

Available information: Aon McMillen offers insurance broking and financial investment advice through its Belfast office. It responded in full to the Northern Ireland Service survey for the last three years after sporadic updates in 2001 and 2003 and a fairly detailed letter in 2000 about its fair employment policies. Northern Ireland Service representatives met with Aon McMillen in 2005. The company's work force has remained stable over the last eight years and company representatives said they did not foresee any major shifts. The company's main source of revenue is insurance sales to commercial and corporate businesses; it also sells personal insurance.

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 managers in Northern Ireland are responsible for fair employment matters.

Underrepresentation analysis: Catholics appear to be underrepresented in Aon's overall work force and in the two higher level employment categories at the company, managers and associate professionals. The Northern Ireland Service 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 comparison for associate professionals and technical workers (43 workers with identified religion) and clerical staff (15 workers with identified religion). The resulting weighted catchment area is 34.4 percent Catholic, but the Catholic share of the work force is only 12 percent.

Aon reports that it has a high staff retention rate, which prevents it from changing the composition of its work force. Still, Aon hired three employees in 2005 and four in the most recent monitoring period; Catholics accounted for less than 30 percent of the new hires. Catholics accounted for a small portion of applicants as well, although their share of the applicant pool increased in the last year. The company does not consider itself to have an underrepresentation of Catholics and is not actively trying to correct the imbalance. Although it may be difficult for Aon to drastically change its work force composition in a year, minor shifts on an annual basis are possible.

Aon McMillen reports to its Dublin office as operations in the Republic and Northern Ireland are run as one company. Company representatives noted that when all employees of the firm (including workers in the Dublin

office) 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. The company consistently responds to the Northern Ireland Service survey.

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 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. Company representatives have never met with the Equality Commission or been asked to conduct affirmative action outreach. Given the low portion of Catholic applicants, the company may need to step up its recruitment efforts. The firm reported that it is difficult to recruit qualified applicants and it does not offer any entry-level positions.

In 2000, the company reported that it expected to boost the Catholic portion of its work force through an acquisition of a company with a predominately Catholic staff, but to date Aon has not acquired any new businesses in Northern Ireland.

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 said 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 and withdrew the complaint in 2006.

AVX

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	2/98	Affirmative Action	No	FET Settlements	0

• **AVX Ltd.**

Location	Coleraine and Larne				
Business	multilayer ceramic capacitor mfg.				
Fair Representation	Catholics appear to be underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	379		74.6%	
	Catholic	129		25.4%	
	Other	23			
	<hr/>				
	Total	531			

2006 Survey Response: full

Available information: The company regularly responds in detail to the Northern Ireland Service survey and NIS staff has interviewed local company officials in Northern Ireland three times, most recently in 2006. AVX also provided copies of its triennial review required under Northern Ireland's fair employment law.

AVX 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 531. AVX closed its small plant in Larne in April 2002, cutting 65 jobs, in addition to other redundancies. During the 2005 monitoring period 30 workers were made redundant. Market conditions have been responsible for employment fluctuations. Kyocera Corp., a publicly traded Japanese company, owns 70 percent of AVX stock, which is traded in the United States.

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

Underrepresentation analysis: Catholics appear to be underrepresented at the company overall and among professionals, skilled workers, sales associates and machine operatives. The Northern Ireland Service compared managers, professionals and skilled employees to Northern Ireland's working age population (42.7 percent Catholic)

and associate professionals, administrative staff, machine operatives and elementary occupations to the Coleraine district council area (34.1 percent Catholic); this area, weighted by job category, is nearly 36 percent Catholic.

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 almost 70 percent of its employees come from the Coleraine district council area, which is 34 percent Catholic according to 2001 census data. Another 17 percent come from nearby Ballymoney, which is 32 percent Catholic.

The company hired two additional workers in the 2006 monitoring period. Of the 23 applicants with identified religion, 16 were Protestants. AVX made 30 employees redundant in 2005; nearly 80 percent were Protestants. In the most recent monitoring period, it made redundant another 15 employees with identified religion; nearly three-quarters 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.

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.

AVX reports that its policies reflect the fair employment standards embodied in the MacBride principles and it has honored its commitment to comply with monitoring by the Northern Ireland Service.

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 major hiring, Catholics appeared to be overrepresented among applicants and new hires, but both communities have been fairly represented among applicants and new hires for the last few years.

Chill factor and neutral workplace: Several years ago, the Northern Ireland Service 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. Northern Ireland Service staff did not see this on the most recent visit in 2006. AVX 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: One person filed three complaints against the company at the FET in 2003. They are all conciliated in 2005. AVX said the complainant alleged discrimination after he was provisionally selected for redundancy.

AVX has a grievance policy, which enables employees to file confidential complaints and to raise a grievance with someone other than their direct supervisor.

Baker Hughes

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	NA	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 Feb. 2006)				
	Protestant	256		91%	
	Catholic	24		9%	
	Other	6			
	<hr/>		Total	286	

2006 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 the Northern Ireland Service annual survey and company representative have met with Northern Ireland Service staff, most recently in 2006. 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 of 286.

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 use cross-community representation "where possible."

The Fair Employment Commission (now the Equality 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. Catholics in the labor pool in the Belfast and Castlereagh areas account for about 22 to 33 percent and about 43 percent for all of Northern Ireland. The Northern Ireland Service compares higher level position to all of Northern Ireland and lower level position to the more narrow Belfast and Castlereagh areas, which suggests the overall work force should be about 34 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 dropped to 8.8 percent in the 2005 monitoring period because the company hired 19 additional employees, 18 of whom are Protestants. It edged up slightly in 2006 to 9 percent.

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, which was only about 10 percent. The company met its reported target of Catholics comprising 25 percent of new hires in 2006. It hired eight workers in 2006, including two Catholics.

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: managers, professionals, associate professional and machine operatives. Operatives account for about three-quarters of the work force. The last time the company had significant redundancies was in 2003 when 36 operatives were made redundant, including five Catholics. There were no redundancies in 2006.

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 was 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 the Northern Ireland Service survey.

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. Yet despite its efforts, Hughes Christensen cannot report significant results. 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 (now the Equality Commission) 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. Nevertheless, in 2006 the firm reported that it finds an appropriate representation of Catholic workers to be 15 percent.

Hughes previously met its 25 percent Catholic new hire goal in 2000 when it hired two Catholics and six Protestants, despite Catholics making up a little less than 10 percent of applicants. It met this goal again in 2006, although overall Protestants accounted for the vast majority of new hires in the two most recent monitoring periods. 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 affirmative action 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 the Northern Ireland Service that it also joins with other local employers to benchmark and share affirmative action strategies. 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. In 2006, company representatives said Hughes Christensen was working with the Equality Commission to come up with innovative ways to reach the Catholic community.

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. A previous personnel manager noted to the Northern Ireland Service in 1998 there are more job opportunities in other area 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 the Northern Ireland Service. 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

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	11/97	Affirmative Action	Yes	FET Settlements	0

• **Perfecseal Ltd.**

Location	Londonderry			
Business	medical packaging			
Fair Representation	Protestants appear to be underrepresented			
Employees	(Data as of Aug. 2006)			
	Protestant	24		13.2%
	Catholic	158		86.8%
	Other	12		
	<hr/>			
	Total	194		

2006 Survey Response: full

Available information: The company has provided detailed information on its work force and fair employment policies and has consistently completed monitoring by the Northern Ireland Service. Perfecseal's human resources administrators met with the Northern Ireland Service most recently in 2006. 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 in 2006 it reported the largest staff to date of 194 employees.

In June 2006, 96 workers were let go after they held a prohibited union meeting during work hours. Management, local politicians and the trade unions came to an agreement a week later and all of the workers were rehired. The company will move to a new location in 2007 because it has outgrown its current facilities. The new site is located on the other side of the River Foyle, which essentially divides the Protestant and Catholic areas of Derry. Company representatives told the Northern Ireland Service that it expects to lose about 15 percent of its staff because some workers are unwilling to cross the river to commute to work in a predominately Protestant area. To help workers get over what the company representatives called this "psychological challenge," Perfecseal is holding employee discussion forums and talks with Amicus, the trade union that represents the majority of the staff.

Compliance with NI fair employment law and Code of Practice: Company practices generally appear consistent with the Code of Practice. Perfecseal's equal opportunity policy 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 in job markets, 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. Perfecseal reviews the background of its applicants to determine success rates by community.

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. The Northern Ireland Service considers all of Northern Ireland an appropriate catchment area for managerial,

professional, skilled workers and sales employees and the Londonderry travel-to-work area for associate professionals, administrative staff, machine operatives and elementary occupations.

Plant and machine operatives represent more than half of the work force and Protestants appear to be clearly underrepresented in this employment category. Protestants also appear to be specifically underrepresented among the elementary job category, associate professionals, sales associates and 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. The skill level of the work force is increasing and entry-level requirements 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 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 20 percent of applications. The company told the Northern Ireland Service 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 several job categories. Among new hires, they do not appear to be underrepresented. In the most recent period the company hired 29 people, 19 of whom are Catholics. 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 of about 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 practices and procedures.

The company told the Northern Ireland Service 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 immediate community surrounding the facility--an area that 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. The company has a grievance policy that allows employees to file confidential complaints. It also enables employees to raise grievances with someone other than their direct supervisor, which could be an independent person of the same community background.

Berkshire Hathaway

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	2/06	Affirmative Action	Unknown	FET Settlements	0

- **Fruit of the Loom Manufacturing**

Location	Derry, Co. Londonderry				
Business	yarn				
Fair Representation	Catholics appear to be underrepresented				
Employees	(Data as of 2006)				
	Protestant	27		45%	
	Catholic	33		55%	
	Other				
	Total	60			

2006 Survey Response: full

Available information: The company announced in September 2005 that over the next five years it will be shutting down its remaining operations 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. The company cited competitive reasons for its decision. Layoffs began this year.

Berkshire Hathaway provided no response to inquiries from the Northern Ireland Service until it agreed to implement the MacBride principles in 2006. Berkshire Hathaway acquired the company in May 2002, after it went bankrupt. The company has one Northern Ireland factory in the Londonderry district council area. It had other sites near Derry as well as operations in Buncrana, Co. Donegal in the Republic of Ireland, but these sites have all been closed.

Employment at the company has dropped dramatically. The highest reported total employment for the company was in 1998, when there were 537 employees; it now employs 60 workers in Northern Ireland, but it expects the number to drop to 35 by the end of 2006. The remaining employees will stay-on until the transfer of operations to Morocco is complete, likely in early 2007.

Compliance with NI fair employment law and Code of Practice: The company has not provided recent information on its policies regarding fair employment.

Underrepresentation analysis: Catholics appear to be underrepresented at the company compared to several plausible catchment areas for the company as a whole. 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 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: Berkshire Hathaway agreed to implement the MacBride principles in February 2006, following a shareholder proposal filed by the New York City Pension Funds. Before 2006, Berkshire Hathaway did not respond to monitoring requests from the Northern Ireland Service, indicating it declined to honor Fruit of the Loom's earlier agreement to implement the principles.

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: No recent complaints have been filed against the company at the Fair Employment Tribunal. The company has a joint management-union grievance procedure that must begin with the direct supervisor concerned.

Blockbuster

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	12/98	Affirmative Action	Yes	FET Settlements	0

• Xtra-Vision

Location	51 stores province-wide		
Business	video tape rentals		
Fair Representation	Protestants appear to be slightly underrepresented		
Employees	(Data as of Feb. 2005)		
	Protestant	185	52.1%
	Catholic	170	47.9%
	Other	0	
	Total	355	

2006 Survey Response: none

Available information: The company responded in detail to the Northern Ireland Service survey from 1997 through 2005, but in did not respond to the 2006 inquiry. Local management also met with Northern Ireland Service staff in Belfast in 1999. Viacom spun off its remaining 82 percent stake in Blockbuster in mid-October 2004. Blockbuster acquired the Xtra-Vision chain of video rental stores in Northern Ireland in 1996. The 51 stores currently operating are located throughout the province and give the company a presence in areas where there are no other U.S. firms. Aside from the primary business of video rentals, Xtra-vision also sells mobile phones, games and other electronic products. Eleven stores are in Belfast, spread fairly evenly around the city in both Catholic and Protestant areas; the remainder are spread across Northern Ireland. Each store employs between four and 11 workers.

Compliance with NI fair employment law and Code of Practice: The company says its operations adhere to fair employment law and the Code of Practice, and that it monitors work force data "for internal purposes" as the information is useful to the company's (and industry's) ongoing recruitment efforts. In 1999, it reported that the fair employment law changes in 1998 "set a model of best practice which the company already conforms to." In 2001, following a review of its practices, the company adopted new equal opportunity and anti-harassment policies. All employees receive training on the new policies.

The company publicly advertises all job openings and notifies all employees of positions open to internal applicants. It uses the Belfast Telegraph, local newspapers, job markets, government job centers (including the Training and Employment Agency of Northern Ireland), local job clubs, the Internet and the employee intranet to publicize its vacancies. Blockbuster uses panels to interview candidates but does not ensure that both communities are represented on them. All interviewers are trained on equal employment issues and the religious composition of applicants are reviewed to ensure no bias has crept into the selection process. Promotions are treated in the same way as other vacancies. The company said that it no longer uses seniority to select employees for upper level jobs so as to ensure equitable treatment for both community groups. Training "is open and offered to all levels regularly"; the company is not participating in any affirmative action outreach efforts involving training, but no such efforts seem warranted.

Employees elect members of an employee relations committee to facilitate discussion and consultation with elected representatives on all issues, including equality of employment. Overall responsibility for equal employment issues lies with the senior vice president/managing director of the company. The director of human resources has line responsibility.

Underrepresentation analysis: Protestants appear to be slightly underrepresented, particularly in the sales group, which makes up 96 percent of the work force. Blockbuster's work force fell by seven employees in the 2005 monitoring period after gaining 60 the previous year. The Catholic share of workers decreased by less than a percentage point to round to 48 percent. In 2004, Catholics accounted for a little more than 48 percent, which was a jump from 45 percent in 2003. Since the company has stores province-wide, all of Northern Ireland is an appropriate catchment area for all job categories.

Catholics made up 51.8 percent of the 2,552 applicants for openings in the 2005 monitoring period and 54 percent of new hires in 2005. No underrepresentation appears to exist among new hires. Nearly all recruitment activity was for sales employees, who make up 96 percent of the overall work force; this employee category also accounts for nearly all applicants and new hires. No employees were made redundant in 2005.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation with former New York City Comptroller Alan Hevesi in late 1998, after investors withdrew a 1999 shareholder resolution asking Viacom to implement the MacBride principles. The company says it will "continue to make lawful efforts to implement the fair employment principles embodied in the MacBride principles."

Affirmative action outreach: The company takes pains to advertise in papers read by both communities. It includes EEO statements in its ads and also uses statements particularly welcoming specific underrepresented groups "in areas where analysis of previous recruitment exercises demonstrates an underrepresentation of applications received from a specific group and therefore warrants the use of such a statement in future recruitment exercises." In its 2000 survey response the company noted, "Whilst the composition of the work force closely reflects the population of Northern Ireland as a whole we continue to promote equality of opportunity at work and will take action where appropriate."

Chill factor and neutral workplace: Travel to and from work "has not been a problem" for employees, but "in the event that it arises, we will examine the situation," the company says. Blockbuster's stores are not concentrated solely in Catholic or Protestant areas, though local managers said in 1999 that some of its "stores cross community lines, but that employees regularly cross those communities" to help cover each other's shifts in different stores.

Viacom provided a copy of Xtra-Vision's new anti-harassment policy and complaints procedures in 2001. The policy says that "acts of harassment/bullying are regarded as gross misconduct, rendering the employee(s) responsible for breaching this policy liable to disciplinary action, including summary dismissal." The definition of harassment is detailed and covers a wide range of potential offenses. The policy allows employees to raise concerns confidentially, laying out the specific responsibilities of employees and managers for ensuring a non-sectarian working environment. The policy outlines both informal and formal procedures for resolving harassment issues. If employees cannot resolve the issue informally, they are directed to bring the complaint to a member of the HR department or another manager. Management then may instigate a formal investigation and interview both parties and other witnesses. The policy says, "All complaints will be investigated promptly with sensitivity and due respect for the rights of all those concerned."

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

Borland Software

MacBride Agreement Unknown **Underrepresentation** No **FET Discrimination Findings** 0

Agreement Date NA **Affirmative Action** NA **FET Settlements** 0

• **Segue Software UK**

Location Belfast
Business technical support center
Fair Representation Neither community appears to be underrepresented
Employees (Data as of 2004)

Protestant	13	46.4%
Catholic	15	53.6%
Other	3	
<hr/>		
Total	31	

2006 Survey Response: none

Available information: After announcing its intentions to set up operations in Northern Ireland in late 1998, Segue provided some general information to the Northern Ireland Service on its employment policies and the size of its work force, but it has not responded since. The Belfast office is still listed on the company's website.

Compliance with NI fair employment law and Code of Practice: Although Segue Software says that it is an equal opportunity employer and that it does not discriminate based on religion, among other factors, it did not indicate if it adheres to fair employment law in Northern Ireland or follows the recommendations and legal requirements of the Code of Practice.

Senior management at Segue's U.S. headquarters supervised the company's equal employment program in 1999, when there was no senior management in Northern Ireland. The company said in 1999 that it publicly advertised all job openings and notified all employees about positions open to internal applicants. Segue also said it advertised job openings in the Belfast Telegraph but not in two other Belfast-based daily papers. It said that both communities were represented on its interview panels and that those involved in candidate selection sometimes received training on equal employment issues. Segue said in 1999 that its interview panel at the time was led by U.S. staff who were "unable to determine religious or political affiliations."

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees with identified religion. However, both communities appear to be fairly represented at the company when the work force is compared to all of Northern Ireland or the Belfast travel-to-work area.

Conformance with MacBride principles: Segue said in 1999 that it did not know if its Northern Ireland operations adhered to the MacBride principles, but its lack of response to the Northern Ireland Service renders it noncompliant.

Affirmative action outreach: No affirmative action appears necessary.

Chill factor and neutral workplace: The company's office in downtown Belfast should not pose a chill factor to either Catholics or Protestants. Segue's U.S. hostile work environment policies apply to its Northern Ireland operations and all employees in Northern Ireland undergo training that addresses potential sectarian harassment and intimidation in the workplace.

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

Caterpillar

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	2/02	Affirmative Action	No	FET Settlements	0

• **Wilson FG (Engineering)**

Location	Larne, Newtownabbey, Belfast			
Business	manufacture of diesel generators			
Fair Representation	Catholics appear to be underrepresented			
Employees	(Data as of Sept. 2006)			
	Protestant	1635		73%
	Catholic	611		27%
	Other	111		
	<hr/>			
	Total	2357		

2006 Survey Response: full

Available information: Caterpillar consistently provides a full response to the Northern Ireland Service survey. Service staff met with F.G. Wilson management in Northern Ireland in 2006 and 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. In the most recent monitoring period, the company's work force grew by more than 40 employees. 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 the Northern Ireland Service 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.

The company has two sets of recruitment procedures for temporary and permanent vacancies. For temporary workers, who are paid an hourly rate, Caterpillar relies on an outside agency to screen applicants. The agency shortlists candidates and arranges interviews. For permanent positions, an outside agency may conduct the job advertising, but Caterpillar shortlists the candidates and asks the agency to arrange the interview. Caterpillar conducts all the interviewing for both types of positions, except in rare occasions when the agency conducts them for temporary workers.

Caterpillar notes that all F.G. Wilson employees are notified of positions open to internal applicants and that it advertises permanent vacancies widely in Northern Ireland newspapers read by both communities. During the selection process, the company always uses an interview panel. It does not ensure cross-community representation on the panels because to do so would be "impracticable and inappropriate," according to the company.

F. G. Wilson reviews the religious composition of applicant and new hire pools to determine success rates by community as part of its annual and triennial submission for the Equality Commission. This 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's senior management 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. F.G. Wilson has had some discussions with employee representatives about equal opportunities.

Underrepresentation analysis: Since the last monitoring period, the Catholic proportion of F.G. Wilson's work force has dropped a percentage point to about 27 percent. It had been around 28 percent for the previous five years; up from under 21 percent ten years prior. Despite the company's substantial progress towards a work force that is more representative of the local population, Catholic underrepresentation at the company still exists. In the most recent monitoring period, Catholics are underrepresented in every employment category at the company and overall.

The Northern Ireland Service considered all of Northern Ireland as the appropriate recruitment area for managers, professionals, skilled workers and sales associates and a smaller area for administrative staff, associate professionals, plant and machine operatives and elementary occupations. These latter occupations were compared 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.

These figures yield an ideal Catholic catchment area of 39.8, which is a far distance from the company's 27.2 percent Catholic composition.

The company provided the Northern Ireland Service with some estimates about the number of employees at each site in 2003. According to the company, about 20 percent of the staff work at the West Belfast site, about 20 percent at Monkstown, and the remaining 60 percent in Larne. More precise and updated data is needed from the company to confirm this assessment. The Equality Commission told FG Wilson its Catholic catchment area should be 25 percent, according to the company.

Catholics were also underrepresented among applicants in the most recent monitoring period. Nearly 70 percent of applicants sought jobs in professional and skilled trades job categories and Catholic were underrepresented among job seekers in both categories. Overall, F.G. Wilson received 825 applications with an identified religious affiliation and less than 30 percent were Catholics. The proportion of Catholic applicants has fallen, but this may have do to with site-specific recruitment drives and a ramping up of the Belfast plant. In 2005, 33.1 percent of 341 applicants were Catholics. In 2004, about 39 percent of 178 applicants with identified religion were Catholics, compared with 38 percent of 137 applicants in 2003. A recruitment agency the company used in 2003 failed to keep track of applicants' religion, but Caterpillar promised to put in place procedures to ensure accurate monitoring subsequently.

Conformance with MacBride principles: Caterpillar reached an agreement on implementation of the MacBride principles and cooperation with monitoring by the Northern Ireland Service 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: The company has conducted many affirmative action measures in the past, but it not longer considers them necessary since it has meet its goal of achieving a Catholic representation of 25 percent in the overall work force.

F.G. Wilson has received a national training award for its involvement in the government's Bridge to Employment Program, designed to provide skills to the unemployed. It ran the program at all three of its locations, conducting outreach in both Protestant and Catholic economically deprived areas, and provided training to 44 unemployed people, 24 of whom completed the program and were offered temporary employment contracts with the company. Few other employers in Northern Ireland have made such efforts.

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 hard line 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 five 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 victimization 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 Engineering Employers' Federation and the Confederation of Shipbuilding and Engineering Unions, reached in 1989.

Northern Ireland's sectarian violence has at times directly affected the company and its workers. Most recently in November 2003, a 31-year-old welder employed by the company was killed in his home in Ballyclare by gunmen from the Ulster Volunteer Force, a Protestant paramilitary group; local press reports said the man had spoken out against loyalist paramilitaries and was killed in retaliation.

Grievances: Since 2003, five complaints have been filed against the company at the Fair Employment Tribunal. One was withdrawn, three were dismissed and one remains pending.

FG Wilson's grievance policy allows employees to file confidential complaints and to raise issues with someone other than a immediate supervisor, including someone of the same community background. In its most recent survey response, the company noted, "If possible/ practicable, complaints will be dealt with by someone with an affinity to the person's background."

Chevron

MacBride Agreement	Yes	Underrepresentation	Unknown	FET Discrimination Findings	0
Agreement Date	1991	Affirmative Action	NA	FET Settlements	0

• **Texaco**

Location	Belfast terminal, 60 service stations				
Business	marketing and distribution of petroleum products				
Fair Representation	Unknown				
Employees	(Data as of July 2004)				
	Total		2		

2006 Survey Response: partial

Available information: In previous years, Texaco reported that it had 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 did not provide an updated staff count in its most recent correspondence with the Northern Ireland Service.

There are 60 directly supplied Texaco retail service stations, 58 of which are run by independent dealers with fuel sales contracts. Texaco owns the remaining two sites--down from five in 2003--which are rented and run by independent operators. Texaco also supplies fuel to an additional 19 sites through an 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 237 to 395 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 the company's workers in Northern Ireland. Making any assessment of fair representation at the company's various operations would be problematic in any case because most of the sites are run by independent operators.

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

Affirmative action outreach: No affirmative action measures are warranted.

Chill factor and neutral workplace: The stations are spread fairly evenly all around the province and the Northern Ireland Service is not aware of any particular sectarian problems at any of the sites.

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

Citigroup

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	8/01	Affirmative Action	NA	FET Settlements	0

• CitiFinancial Europe PLC

Location	Derry, Lisburn, Belfast		
Business	financial services		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of Sept. 2006)		
	Protestant	2	25%
	Catholic	6	75%
	Other	1	
	Total	9	

2006 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 the Northern Ireland Service 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 may use an interview panel to select candidates, but given its small size this is likely difficult. 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: The Northern Ireland Service does not assess the demographics of the work force if it falls under a 30 person threshold. CitiFinancial did not take any applicants or new hires in the most recent monitoring period. Three employees were made redundant.

In 2005, just 13 people applied for openings and five were hired: two Protestants and three Catholics. In the previous year the company had 24 applicants and nine new hires. The company 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: The Northern Ireland Service is not aware of any sectarian problems at the company's operations.

Grievances: No recent complaints have been filed against the company at the FET. 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. It allows employees to bring confidential complaints and to raise issues with someone other than their direct manager. 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

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	NA	FET Settlements	0

• Claire's Accessories UK

Location	11 locations province-wide		
Business	fashion accessories		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of 2006)		
	Protestant	20	53%
	Catholic	18	47%
	Other	9	
	<hr/>		
	Total	47	

2006 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. The full-time work force shrunk from 145 workers in 2002 to 119 in 2003 and has hovered around 45 workers for the past two years. Claire's stores employs a majority of part-time workers. As of 2006, it has 112 part-time employees; more than double the full-time staff level.

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 Newsletter, other local papers and on notices posted in job centers 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 for smaller employers. In its survey response, the company said "all employees in skilled and upper level jobs have access to all programs 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."

Staff at the corporate headquarters oversee the company's equality policy.

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. Last year, 82 percent of the company's workers were classified as "other," which indicated a potential problem with the company's monitoring procedures, but in the most recent monitoring period all but nine employees with identified with a particular community. 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. In the past, the firm told the Northern Ireland Service, "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." The company appears to have changed its monitoring procedure.

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, 12.1 percent in 2005 and 14.9 percent in 2006. 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. The company has responded to the Northern Ireland Service survey for the last couple of years.

Affirmative action outreach: No affirmative action measures are warranted.

Chill factor and neutral workplace: The Northern Ireland Service 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. The company's grievance procedure allows workers to raise issues with someone other than their immediate supervisor.

Clear Channel Communications

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1/06	Affirmative Action	NA	FET Settlements	0

- **Clear Channel NI Ltd.**

Location	Belfast			
Business	advertising			
Fair Representation	Neither community appears to be underrepresented			
Employees	(Data as of March 2005)			
	Protestant	13		50%
	Catholic	13		50%
	Other	1		
	<hr/>			
	Total	27		

2006 Survey Response: full

Available information: The company has a small office in Northern Ireland with just 27 employees, working in Clear Channel's advertising business. The company responded to the Northern Ireland Service survey in January 2006.

Compliance with NI fair employment law and Code of Practice: The company says its policies and practices conform to Northern Ireland fair employment law and the Code of Practice. It says that all job openings are publicly advertised, and that all employees are notified of openings. Clear Channel uses the Belfast Telegraph for ads, along with its intranet and recruitment agencies. The company always uses a panel with more than one person to interview job candidates, sometimes is able to ensure cross-community representation on panels, but has not trained employees involved in candidate selection on EEO issues--something that fair employment experts would consider advisable. The company does, however, review the religious composition of its applicant and new hire pools to determine community success rates, which can flag problems in recruitment procedures. The company says it uses its company handbook policies and employment contracts to ensure its work place remains free of sectarianism.

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

Conformance with MacBride principles: The company indicated in its January 2006 survey response that its policies conform with the MacBride principles and it agreed to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach: No affirmative action appears warranted.

Chill factor and neutral workplace: The company reports it has had no difficulties with chill factor.

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

Coca-Cola Co.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	9/04	Affirmative Action	NA	FET Settlements	0

- **Coca-Cola Bottlers (Ulster) Ltd.**

Location	Lisburn		
Business	soft drink bottling		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of Sept. 2006)		
	Protestant	346	63%
	Catholic	206	37%
	Other	14	
	Total	566	

2006 Survey Response: full

Available information: The company has responded in full to the Northern Ireland Service survey for the last few years. Service staff 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 Lambeg site in Lisburn 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. 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," a Coca-Cola representative 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 the Northern Ireland Service 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 most 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, other local newspapers, and trade publications, job markets and through recruitment agencies company notice boards. 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."

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: Both communities appear to be fairly represented among staff at the company's operations in Lisburn, where the majority of employees work. The Omagh facility is a warehouse and delivery depot, which has about 20 employees. 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 make up a little less than a quarter of Coca-Cola Bottlers' work force.

The company had 779 applicants in 2006 and 260 applicants for associate professional positions. Protestants were underrepresented among applicants to this position, but not among the 28 new hires. Overall, the company hired 84 workers in the most recent monitoring period and both communities appear to be fairly represented.

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 comply with monitoring by the Northern Ireland Service. In its most recent survey response, the company reported that MacBride "compliance is monitored and reported at local board meetings to the Directors of the company."

Affirmative action outreach: No affirmative action measures appear warranted. 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 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 the Northern Ireland Service 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.

Grievances: No recent complaints have been filed against the company at the FET. The head of the Human Resources department 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. The company's grievance policy allows for employees to file confidential complaints and to bring issues to someone other than their immediate supervisor, including a colleague who shares the same community background.

Computer Sciences

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	11/03	Affirmative Action	No	FET Settlements	0

• CSC Computer Sciences

Location	Derry (2 sites), Ballymena, Newtownabbey		
Business	IT outsourcing		
Fair Representation	Protestants appear to be underrepresented		
Employees	(Data as of July 2005)		
	Protestant	15	28.8%
	Catholic	37	71.1%
	Other	3	
	<hr/>		
	Total	55	

2006 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. The Northern Ireland Service first identified CSC's Northern Ireland subsidiary in 2003. The company has provided complete responses to the annual 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 the Northern Ireland Service that 30 of its 46 professionals are based in Derry—a heavily Catholic region of Northern Ireland.

The company appears to have reorganized their associate professionals and technical workers under the professional category; 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. However, both managers and professionals are typically recruited from a catchment area including all of Northern Ireland, which is 42.7 percent Catholic. In a 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, the Northern Ireland Service 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 the Northern Ireland Service 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 the catchment area assessment, making it more Catholic and lessening or erasing the extent of Protestant underrepresentation. The Northern Ireland Service 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 the Northern Ireland Service 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 the Northern Ireland Service 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."

Crane

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	Yes	FET Settlements	0

• Stockham Valve Ltd.

Location	Belfast				
Business	industrial check valves; oil field equipment				
Fair Representation	Catholics appear to be underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	62		90%	
	Catholic	7		10%	
	Other	5			
	Total	74			

2006 Survey Response: full

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 74 in 2006. Stockham Valve completed a full response to the 2006 Northern Ireland Service survey and provided copies of its policies.

Compliance with NI fair employment law and Code of Practice: The company reports that its policies are in line with fair employment laws in Northern Ireland. It informs its employees and publicly advertises job opportunities as they become available. Openings are advertised in the Belfast Telegraph, the Irish News, the Internet, the company intranet, through recruitment agencies and at job markets. When selecting candidates, the company uses an interview panel comprised of employees that have been trained in EEO issues, but it does not ensure that both communities are represented on these panels. Crane Stockham reviews the religious composition of its applicants to determine success rates by community and ensure the selection process is not biased. Promotion opportunities at the company are internally advertised and the company said, "normal recruitment procedures are followed with the selection made on merit only." Likewise, it reported that a set of criteria is considered when redundancies are necessary.

The company EEO policy includes specific reference to sectarian issues in Northern Ireland. One of the stated objectives in the policy is to, "monitor the outcome of our recruitment, selection, training and promotion procedures and the composition of our work force and undertake periodic reviews as required by Article 55 of the Fair Employment and Treatment (NI) Order 1998." It also says it will "take remedial action to eliminate any imbalance or distortion." Crane's harassment policy lists specific offenses that are inappropriate in the workplace and states, "It should be noted that it is the impact of the behavior which is relevant and not the motive or intent behind it."

Underrepresentation analysis: Catholic representation is up from only 7.9 percent in 1996 but Catholics continue to be clearly underrepresented at the company because the vast majority of clerical and skilled staffers are Protestants. The ideal Catholic representation at the company is nearly 39 percent Catholic and the 10 percent Catholic work force falls far short of this mark. Protestants accounted for nearly 70 percent of the applicants in 2006 and 77 percent of the new hires. In February 2004, Catholics made up 11 percent of the work force. The company asserted that 11 percent Catholic is an appropriate catchment figure, but this percentage is much lower than the catchment figure for the all of Northern Ireland at 42.7 percent Catholic and much less than the narrower Belfast travel-to-work area, which is 33 percent Catholic.

Conformance with MacBride principles: The company has no MacBride implementation agreement. For the last several years, Crane has received a shareholder proposal asking it to implement the principles. The proposal got 12.9 percent support in 2002, 8.3 percent in 2003 and 11.6 percent in 2004. In 2005, the proposal was allowed to be omitted from the proxy statement because it was filed too late and in 2006 the resolution got 13.4 percent support. A company official indicated to the Northern Ireland Service 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 the referenced survey, 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: The company does not have an affirmative action plan despite the underrepresentation of Catholics. In the 2006 survey response, management suggested that its recruitment procedures preclude a need to further affirmative action measures. In response to questions regarding affirmative action, the company reported that "all vacancies are advertised in newspapers that provide for both sections of the community" and noted that it advertises in "all job centers" and puts an EEO statement in its ads. The company uses job markets in predominately Catholic areas to boost the number of Catholic applicants and includes a welcoming statement in its ads.

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 the Northern Ireland Service 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." In its 2006 survey response, the company said, "The workplace is a neutral environment, all employees including new hires are made aware of the company's Equal Procedure." It also added, "in general the situation in Northern Ireland is now much more relaxed." All of the company's employees receive training on potential sectarian harassment and intimidation at the workplace, using materials from the Equality Commission and the Engineering Employers Federation.

The company harassment policy contains a section on flags & emblems that specifically outlines materials prohibited from the workplace. Although employees are not allowed to bring, among other items, flags to work, the policy includes the statement, "The national flag will be flown outside the company premises throughout the year."

Grievances: No fair employment grievances have been filed against the company in recent years. Crane Stockham has a grievance policy, which informs employees that they can raise issues with a manager of their choosing. The policy also lays out the procedure and timeframe for handling and resolving complaints.

Crawford

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	2/04	Affirmative Action	NA	FET Settlements	0

- **Crawford & Co. (UK)**

Location	Belfast				
Business	insurance services				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	17		65.4%	
	Catholic	9		34.6%	
	Other	0			
	<hr/>				
	Total	26			

2006 Survey Response: full

Available information: Crawford's office in Belfast processes liability and property claims. 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 63 countries." The company provided a complete response to the Northern Ireland Service survey for the last three 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 may preclude 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 company periodically "analyzes all areas of employment in the Corporation to assure adherence to the principles of equal opportunity."

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation within a work force with fewer than 30 employees. However, no group appears to be underrepresented when the company's 12 managerial and professional posts are compared to Northern Ireland as a whole and its 14 clerical staff to the Belfast travel-to-work area. The resultant catchment area would be about 35 percent Catholic, which fits well with the 34.6 percent Catholic share of the work force.

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."

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

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. Crawford also reported, "For many years we have operated in Belfast, supporting clients from both sections of the community. Never has there been any bias or allegation of bias against us from any quarter."

Danaher

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	2/03	Affirmative Action	NA	FET Settlements	0

• Hathaway Systems

Location	Belfast				
Business	power utility monitoring equipment				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of 2006)				
	Protestant	37		71%	
	Catholic	15		29%	
	Other	6			
	<hr/>				
	Total	58			

2006 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 consistently responds to monitoring by the Northern Ireland Service. Employment at the company has fluctuated over the years between 51 in 2004 and 70 in 2000. It hired 10 additional employees in 2005 and one worker in the most recent monitoring period, bringing the total work force to 58.

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: Both communities appear to be fairly represented in the work force. The Northern Ireland Service 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 travel-to-work area for clerical and manual 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.

Chill factor and neutral workplace: The company 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. In its most recent survey response, the company reported, "We strictly enforce the terms of our fair employment and harassment policies and anyone in breach of these policies will be subject to disciplinary action under gross misconduct."

Grievances: No fair employment grievances have been filed against the company in recent years. 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's grievance policy allows for employees to file confidential complaints and to raise issues with someone other than their immediate supervisor, which may include a colleague of the same community background.

DuPont (E.I.) de Nemours

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	Neither community appears to be underrepresented				
Employees	(Data as of June 2006)				
	Protestant	59		35.2%	
	Catholic	109		64.8%	
	Other	2			
	<u>Total</u>	<u>170</u>			

2006 Survey Response: full

Available information: DuPont operates a Kevlar production facility in Londonderry, Northern Ireland. The company 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.

Company representatives expect to see an annual growth rate of 7 percent.. They are hopeful that Dupont will not be affected by the manufacturing squeeze on Northern Ireland that is prompting many companies to move operations to countries with lower wage earners. They say their product is unique in that Kevlar is a patented product and requires highly skilled workers with specialized training and an acute attention to protecting intellectual property.

Compliance with NI fair employment law and Code of Practice: The company's policies and procedures are in compliance with Northern Ireland fair employment laws. A human resources department in Northern Ireland manages the recruitment process, but it relies on a central human resources office in Spain to streamline questions from candidates and recruitment agencies, which short list candidates using objective criteria and aptitude tests. The recruitment agencies also send out applications and keep track of monitoring information. Job advertisements are placed in market-specific magazines, the Belfast Telegraph and the Derry Journal. When the company uses an panel to interview candidates, it ensures both communities are represented. Employees involved in candidate selection have completed EEO training. Dupont reviews the religious composition of its applicants to determine success rates by community. The company conducts diversity training for all of its employees and requires that employees pass tests demonstrating an understanding of company policies.

U.K. and Northern Ireland managers as well as corporate headquarters and the corporate board oversees the company's equality policy.

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 60 percent Catholic, which is in line with the composition of the company's work force.

Conformance with MacBride principles: DuPont reached an accord with shareholder proponents of the MacBride principles in 1992 and has for the most part cooperated with the monitoring process by the Northern Ireland Service. It met with Service staff in 2006.

Affirmative action outreach: No affirmative action efforts are warranted.

Chill factor and neutral workplace: The company's site outside Derry is accessible to both communities and just off a major motorway. Sectarian flags and emblems are banned as are football jerseys or any other overtly provocative emblems. Dupont does not recognize sectarian holidays, including St. Patrick's Day and the July 12th Drunecree parades.

Company representatives told Northern Ireland Service staff that overtly sectarian problems have never occurred at the work place. They attribute this cohesive working environment to generous salaries, which workers are unwilling to risk losing, and a strong presence by the parent company dating from the start of operations. The parent company's hands-on approach to the Northern Ireland operations helped to disseminate the corporate policies against harassment.

Grievances: No fair employment grievances have been filed against the company in recent years. Dupont has a grievance policy that allows employees to file complaints confidentially or with someone other than their immediate supervisor.

Emerson Electric

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	9/98	Affirmative Action	NA	FET Settlements	0

• Copeland Co.

Location	Cookstown, Co. Tyrone		
Business	scroll compressors		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of March 2005)		
	Protestant	108	46%
	Catholic	127	54%
	Other	7	
	<u>Total</u>	<u>242</u>	

2006 Survey Response: none

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, but it did not respond in 2006. 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. 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. In previous years, Protestants have been underrepresented in the skilled worker employment category, which accounts for 29 percent of the work force.

The proportion of Protestant applicants rose to 42 percent in 2005 (115 Catholics out of 257 prospective employees), from 31 percent in 2004 and of the 26 new hires in 2005, almost half were Protestants.

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 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 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 withdrawn in December 2004.

General Electric

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	9/98	Affirmative Action	Yes	FET Settlements	0

- Hurst (Charles)**

Location	Belfast and seven other towns				
Business	vehicle sales, service				
Fair Representation	Catholics appear to be significantly underrepresented				
Employees	(Data as of Feb. 2006)				
	Protestant	674		75.5%	
	Catholic	219		24.5%	
	Other	62			
	<hr/>				
	Total	955			

2006 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 reported in 2005 that the latter's employment information is tallied with Hurst's figures in its survey response. Charles Hurst responded fully to the Northern Ireland Service survey for the first time in 1999 and since then it has regularly submitted responses. In 2005, company representatives also met with Northern Ireland Service staff.

The Equality Commission reported in September 2004 that Hurst's personnel manager in Manchester, England, was vigorously implementing the company's EEO policies.

The company's work force has expanded substantially in the last few years, growing to the present level of 955 full-time workers from only 566 in 1997. Hurst has 18 locations including car dealerships, tire repair stores and/or repair shops in Bangor, Belfast (eight sites), Coleraine, Lisburn, Londonderry, Newtownabbey, Newtownards, Omagh and Portadown (three sites). Company representatives told the Northern Ireland Service 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. In 2005, company representatives reported that most 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 when higher level positions are compared to a catchment area that includes all of Northern Ireland and the other remaining staff is compared to more narrow estimates. Catholics have been most underrepresented among managers and sales associates and Charles Hurst appears to have made efforts to boost the portion of Catholics in these job categories. Last year, only 10 of 100 managers were Catholics and in the most recent period they now account for 11 of 91 managers. In the Sales category, Catholics have increased from about one-third of the staff to

about 35 percent. Still, Catholics continue to make-up less than a quarter of the total work force with identified religion, even though the catchment area suggests they should comprise roughly 30 to 35 percent.

Catholics also appear underrepresented among applicants, but in the most recent monitoring period both communities were fairly represented among new hires. This is a dramatic change from past years when Catholics were typically underrepresented among new hires as well.

Charles Hurst argues that the imbalance in its work force stems from 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.

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

Affirmative action outreach: In its 1998 affirmative action agreement with the 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 succeed in meeting the first goal, but not the later; Catholics currently account for about 25 percent of the work force. 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."

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 workplace is a dismissible 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: One man alleging religious discrimination filed two complaints against the company in the past three years; both are pending.

General Electric

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	9/98	Affirmative Action	Yes	FET Settlements	0

- **GE Capital Woodchester (NI)**

Location	Belfast
Business	auto leasing
Fair Representation	Neither community appears to be underrepresented
Employees	(Data as of Nov. 2006)
	Total 5

2006 Survey Response: minimal

Available information: The company's most recent response to the Northern Ireland Service survey was in 2004, although for the last two years, GE has checked the profile to ensure its accuracy. GE has said Woodchester's policies adhere to fair employment law in Northern Ireland. All managers are fully briefed on policies and procedures of equal opportunity and sectarian harassment. Managers in Northern Ireland are responsible for "developing and promoting a fair place of work" while senior management in the Dublin head office have oversight and "ensure objectivity in recruitment and grievance handling."

The company's hiring and selection processes seem to adhere to Northern Ireland's fair employment law. Employment at this subsidiary has dropped precipitously and now stands at five. Given its small size, the company does not report data on the religious composition of its work force.

General Electric has a MacBride implementation agreement applicable to its three wholly owned subsidiaries, including GE Capital Woodchester. The company's office is located in a business complex in south Belfast, an area generally considered neutral ground. The company has a policy on sectarian harassment that it circulates to all employees. Sectarian harassment is a disciplinary offense that could result in dismissal. The general manager is responsible for all grievances raised through the formal complaints procedure. Employees who believe they have been inequitably treated may raise grievances at the senior management level and locally or directly with the human resources department.

No discrimination complaints have been filed against the company since 2000.

General Electric

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	9/98	Affirmative Action	Yes	FET Settlements	0

• GE Medical Systems

Location	Belfast				
Business	sales/service of medical equipment				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	7		46.6%	
	Catholic	8		53.3%	
	Other	0			
	<hr/>				
	Total	15			

2006 Survey Response: full

Available information: GE Medical Systems has a small operation in Belfast. Employment at the company grew from only three in 1998 and it now employs 15 workers. Workers at the service office maintain the company's medical diagnostic imaging equipment used in hospitals and clinics in Northern Ireland. GE provided a copy of the company's 2006 monitoring report that it submitted to the Equality Commission.

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. 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. 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.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

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.

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

Grievances: No discrimination complaints have been filed against the company at the Fair Employment Tribunal in recent years. With regards to its grievance procedures, the company says "standard GE procedures are in place."

Goodrich

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	12/02	Affirmative Action	NA	FET Settlements	0

• Goodrich Control Systems

Location	Belfast				
Business	software engineering				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of Sept. 2006)				
	Protestant	23		68%	
	Catholic	11		32%	
	Other	3			
	<hr/>				
	Total	37			

2006 Survey Response: full

Available information: Goodrich bought TRW's aeronautical unit, which included an operation in Northern Ireland, in 2002. TRW responded to the Northern Ireland Service 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. Both communities appear to be fairly represented at the company. Catholics account for about 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.

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 monitoring by the Northern Ireland Service. TRW reached a similar agreement earlier in 2001.

Affirmative action outreach: No affirmative action measures appear warranted.

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

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	1989	Affirmative Action	No	FET Settlements	0

• Hewlett-Packard

Location	Belfast				
Business	computer sales, consultancy and service				
Fair Representation	Protestants appear to be underrepresented				
Employees	(Data as of May 2006)				
	Protestant	25		44.6%	
	Catholic	31		55.4%	
	Other	6			
	<hr/>				
	Total	62			

2006 Survey Response: full

Available information: Before its April 2002 merger with Hewlett-Packard, Compaq Computer regularly responded to the Northern Ireland survey, providing annual survey responses and arranging on-site interviews with local managers over the years--most recently in 1999. 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 62 workers. The company provided a full response to the survey for the last three years. Before the merger, HP had five employees of its own in Belfast; these have been merged into the single HP operation.

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

Compliance with 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 advertises available jobs on the Internet 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 success rates by community. Employees are notified of available positions at the company. Senior management in Northern Ireland and the U.K. as well as corporate headquarters are responsible for the company's equality policy.

Underrepresentation analysis: Protestants appear to be underrepresented at the company and specifically among its sales department staff. Hewlett-Packard reports that its Belfast location is accessible to all districts and areas. The Northern Ireland Service 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. The work force grew slightly in 2004 and 2005, but it has one less employee as of the most recent monitoring period. Both communities would appear fairly represented in the sales associate employment category if the company employed a few more Protestant sales representatives. It is questionable, however, how significantly this would change the overall assessment because the other work force categories reflect fair representation, but only by a small margin. In 2005, the company hired two additional workers from a pool of seven applicants. There were no new hires or applicants in the most recent monitoring period.

Conformance with MacBride principles: Hewlett-Packard appears to be honoring MacBride compliance commitments made by predecessor companies.

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 monitoring by the Northern Ireland Service.

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. The company is not conducting any affirmative action measures and does not appear to agree they are warranted.

Chill factor and neutral workplace: The company's location is accessible to both communities, and the company says there have been no difficulties with sectarian incidents.

Grievances: No complaints have been filed against the company at the Fair Employment Tribunal. The company has a grievance policy that allows employees to file complaints confidentially and with someone other than their immediate supervisor

IAC/Interactive

MacBride Agreement	Yes	Underrepresentation	Unknown	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	NA	FET Settlements	0

• **Ticketshop (NI) Ltd.**

Location	Belfast
Business	Ticket sales
Fair Representation	Unknown
Employees	(Data as of 2006)
	Total 2

2006 Survey Response: full

Available information: The company has a very small presence in Northern Ireland with only two employees. It responded to the Northern Ireland Service survey for the first time in 2006. The company reports that its policies reflect the MacBride principles and it agreed to comply with monitoring by the Northern Ireland Service. IAC has a harassment policy that complies with fair employment laws in Northern Ireland and sets out the procedures for addressing complaints. Employees can raise issues with a supervisor, a member of the human resources staff or another manager with whom the employee would feel more comfortable. No fair employment assessment can be made on the work force given its small size. No fair employment grievances have been filed against the company.

International Business Machines

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	11/92	Affirmative Action	NA	FET Settlements	0

• IBM United Kingdom

Location	Belfast				
Business	computer sales and service				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of May 2005)				
	Protestant	19		67.9%	
	Catholic	9		32.1%	
	Other	5			
	<hr/>				
	Total	33			

2006 Survey Response: none

Available information: The company usually responds in full to the Northern Ireland Service fair employment survey each year, but it did not respond in 2006. Employment has steadily inched upwards and now stands at 33 employees, according to the most recent data.

Compliance with NI fair employment law and Code of Practice: The company's policies appear to adhere to the fair employment laws in Northern Ireland.

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 are not 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 identify to anyone but the Speak Up coordinator.

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

Marsh & McLennan

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	NA	FET Settlements	0

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

Location	Belfast and Strabane		
Business	insurance services		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of 2004)		
	Protestant	46	69%
	Catholic	21	31%
	Other	0	
	<hr/>		
	Total	67	

2006 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. The subsidiary merged with Sedgwick Noble Lowndes in 1999. The company last responded to the Northern Ireland Service survey in 2003. For more information see the profile the other Marsh & McLennan subsidiary in Northern Ireland, Mercer Human Resources Consulting.

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 when compared to a catchment area that includes all of Northern Ireland. 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 2004, the percentage of Catholics stood at about 31 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: Affirmative action efforts are 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. The other site outside of Derry city is in a predominately Protestant neighborhood and could be off-putting towards Catholics.

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

Marsh & McLennan

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	NA	FET Settlements	0

• Mercer Human Resources Consulting

Location	Belfast				
Business	pensions consultancy/administration				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of 2004)				
	Protestant	30		67%	
	Catholic	15		43%	
	Other	5			
	<hr/>				
	Total	50			

2006 Survey Response: none

Available information: Marsh & McLennan stopped responding to the Northern Ireland Service annual requests for information in 2004, when management at Marsh & McLennan explained that there is little time to deal with anything but the lawsuit filed by New York attorney general, Eliot Spitzer. The suit charged that the company engaged in bid rigging and inappropriate fees. Marsh settled the allegations in January 2005, agreeing to pay \$850 million in restitution, according to press reports. Marsh suffered a decline and sales and staff during the investigations, but the Northern Ireland work force does not appear to have been directly affected.

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 five years--between three and seven new hires annually. The company has begun to use more recruitment agency applicants and began monitoring them in 2003. Recent hires have been predominately Catholic.

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.

McDonald's

MacBride Agreement	Yes	Underrepresentation	Maybe	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

• McDonald's Restaurants

Location	24 locations province-wide		
Business	fast food		
Fair Representation	Protestants appear to be underrepresented		
Employees	(Data as of Aug. 2006)		
	Protestant	81	37%
	Catholic	139	63%
	Other	23	
	<hr/>	<hr/>	<hr/>
	Total	243	

2006 Survey Response: full

Available information: McDonald's has 10 franchise operations with a combined 26 restaurants in Northern Ireland. Ten restaurants are owned and operated by the company through its subsidiary, McDonald's Restaurants Ltd., in Portadown, Lurgan, Downpatrick, Belfast (two locations), Craigavon, Enniskillen, Cookstown, Omagh and Dungannon. The other nine franchise holders in Northern Ireland are: JMC Restaurants Ltd. in Lisburn, North West Restaurants Ltd. in Londonderry (three restaurants), Dunluce Restaurants Ltd. in Coleraine, Mark Cobain in Newtownabbey and Glengormley, Paul McDermott in Belfast, Geoff Hewitt in Ballymena and Carrickfergus, Keith Inskip in Douglas, Rahon Enterprises in Bangor and Belfast, S & S Restaurants Ltd. in Newry, and Paul Connan Ltd. in Dundonald and Belfast.

The company has always provided a complete response to the Northern Ireland Service survey, describing its fair employment policies in detail and providing overall employment information for its franchise operations.

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 favorably 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 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 the Northern Ireland Service. The policy was last updated in December 2003.

Underrepresentation analysis: Protestants appear to be underrepresented in the 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 account for more than 60 percent of the work force at the franchise operations, far exceeding the ideal estimate of between 42 and 46 percent.

According to more specific data provided by the company in 2005, Catholics made up 61 percent of McDonald's managers, even though the appropriate figure as compared to the catchment area is around 46 percent. Catholics also made 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. This group of employees accounted for 62 percent of the work force in 2005, while managers accounted for nearly all the remaining employees.

In 2005, Protestants also appeared underrepresented among applicants and new hires for personal service occupations at the company. In 2005, 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 the Northern Ireland Service 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 the Northern Ireland Service 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: The Northern Ireland Service 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 the Northern Ireland Service 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 restaurant 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.

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

- **North West Restaurants Ltd.**

Location 3 in Londonderry

Business fast food

Fair Representation See profile for MacDonald's Restaurants

2006 Survey Response: full

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

No complaints have been filed against the company since 2003.

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

- **Connan Paul Ltd.**

Location Dundonald and Belfast

Business fast food

Fair Representation See profile for MacDonald's Restaurants

2006 Survey Response: full

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

No fair employment grievances have been filed against the company.

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

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

Location Newry
Business fast food
Fair Representation See profile for MacDonald's Restaurants

2006 Survey Response: full

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

No fair employment grievances have been filed against the company.

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

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

Location Bangor
Business fast food
Fair Representation See profile for MacDonald's Restaurants

2006 Survey Response: full

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

No fair employment grievances have been filed against the company.

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

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

Location Belfast
Business fast food
Fair Representation See profile for MacDonald's Restaurants

2006 Survey Response: full

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

No fair employment grievances have been filed against the company.

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

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

Location Ballymena
Business fast food

2006 Survey Response: full

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

No fair employment grievances have been filed against the company

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

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

Location	Belfast
Business	fast food
Fair Representation	See profile for MacDonald's Restaurants

2006 Survey Response: full

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

No fair employment grievances have been filed against the company.

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

- **Dunluce Restaurants t/a McDonalds**

Location	Coleraine
Business	fast food
Fair Representation	See profile for MacDonald's Restaurants

2006 Survey Response: full

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

McDonald's

MacBride Agreement	Yes	Underrepresentation	See profile	FET Discrimination Findings	0
Agreement Date	1994	Affirmative Action	No	FET Settlements	0

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

Location Lisburn

Business fast food

Fair Representation See profile for MacDonald's Restaurants

2006 Survey Response: full

Available information: See McDonald's Restaurant Ltd. for more information on this franchise. No fair employment grievances have been filed against the company.

Merck

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	9/02	Affirmative Action	NA	FET Settlements	0

• Sharp & Dohme

Location	sales people work from home				
Business	sales				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	10		59%	
	Catholic	7		41%	
	Other	0			
	<hr/>				
	Total	17			

2006 Survey Response: full

Available information: Merck has for years maintained a small pharmaceutical sales force in Northern Ireland, which in 2004 grew to 16 workers. The company hired an additional employee in 2006. The company has been responsive to the Northern Ireland Service survey and has described its policies and work force breakdown for the last several years.

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. 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: The Northern Ireland Service does not statically assess companies with fewer than 30 employees. However, the employee breakdown at Merck is reflective of the community breakdown in Northern Ireland.

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.

Microsoft

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	2006	Affirmative Action	NA	FET Settlements	0

- **Microsoft**

Location	Belfast		
Business	software		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of May 2006)		
	Protestant	8	57%
	Catholic	6	43%
	Other		
	<hr/>	<hr/>	<hr/>
	Total	14	

2006 Survey Response: full

Available information: Microsoft provided the Northern Ireland Service with a copy of its fair employment monitoring return in 2005 and it completed the survey in 2006. The company opened new premises in Belfast in September 2004. Invest Northern Ireland contributed £168,000 of the total investment of £700,000. In 2006, the company passed the 11-member work force threshold requiring it to register with the Equality Commission and submit annual monitoring returns.

Compliance with NI fair employment law and Code of Practice: The company's policies appear to adhere to fair employment laws in Northern Ireland. Employees are always notified of job openings, which are publicly advertised in the Belfast Telegraph, the Internet and the company intranet. The company does not systematically use interview panels, which is not surprising given their small work force. It also does not train those involved in candidate selection on EEO issues (although they are trained on the MacBride principles and diversity).

Microsoft has said it has a "total commitment to fair employment in Northern Ireland."

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. However, both communities appear to be fairly represented at the company. Microsoft hired 12 new workers in 2006 from a pool of 27 applicants. Both communities were fairly represented among applicants, which suggests the company is viewed as an equal opportunity employer. Protestants accounted for the majority of new hires.

Conformance with MacBride principles: The company has not received a shareholder resolution asking it to comply with the MacBride principles, but in its 2006 survey response it reported that its policies comply with the principles and it agreed to complete the Northern Ireland Service annual survey. Microsoft also reported that it educates all recruitment and hiring managers on the MacBride principles.

Affirmative action outreach: No affirmative action measures appear warranted, however, Microsoft places an EEO statement in its advertisements and it conducts recruiting efforts in local schools.

Chill factor and neutral workplace: The company is located in an industrial area in a Protestant area that has seen sectarian tensions; this could be off-putting to Catholics interested in working at the company. Microsoft has installed security infrastructure that should help employees feel safe at the site. Microsoft has its own access control system, the landlord provides security services and there is a secured staff car park that is monitored by video cameras.

All employees, including managers, undergo diversity training in an effort to address potential sectarian harassment or intimidation in the workplace.

Grievances: No complaints have been filed against Microsoft at the Fair Employment Tribunal. The company has a disciplinary procedure and a grievance procedure that provide a clear framework on how to deal with employee complaints. Workers can raise issues with someone other than their immediate supervisor and a co-religionist if desired; they can also file complaints confidentially. Offenders will be dismissed for gross misconduct or for lesser misconduct that is not corrected. The grievance procedure has an informal and a formal track as well as an appeals process.

Nacco Industries

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1991	Affirmative Action	Yes	FET Settlements	1

- **Nacco Materials Handling**

Location	Craigavon, Co. Armagh		
Business	industrial fork lift trucks		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of Sept. 2006)		
	Protestant	434	58%
	Catholic	312	42%
	Other	21	
	Total	767	

2006 Survey Response: full

Available information: The company consistently responds to monitoring by the Northern Ireland Service and Service staff interviewed 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 short listing 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.

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: Both communities appear to be fairly represented in the Nacco's work force. In the past, Catholics appeared to be underrepresented among plant and machine operatives and the work force as a whole. Applicants and new hire figures also show fair representation of both communities. Managers, professionals, sales associates and skilled workers were compared to a recruitment area and included all of Northern Ireland, while the rest of the work force was compared to the Craigavon travel-to-work area. Plant and machine

operatives make up about three-quarters of the staff at Nacco. There have not been any redundancies in the past three years.

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: In 2005, Nacco achieved its original affirmative action plan goals to boost the Catholic proportion of applicants and new hires to not less than 45 percent. Catholic applicants were just shy of the 45 percent benchmark in the most recent monitoring period, but among new hires Catholics accounted for about 56 percent. This goal has come five years later than expected. 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 76 in 2005. Staff levels have declined slightly to 767 workers.

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: Four complaints have been filed against the company since 2003. One complaint was settled, one withdrawn and two remain pending. 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.

Omnicom Group

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1/02	Affirmative Action	NA	FET Settlements	0

• Drury Communications

Location	Belfast				
Business	public relations				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of 2004)				
	Protestant	9		60%	
	Catholic	6		40%	
	Other	0			
	<hr/>				
	Total	15			

2006 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 previously responded to the Northern Ireland Service survey, but not for the past two years. 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: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

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

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	9/04	Affirmative Action	Yes	FET Settlements	0

• Openwave

Location	Belfast				
Business	telecommunications software				
Fair Representation	Protestants are underrepresented in the work force				
Employees	(Data as of Aug. 2006)				
	Protestant	37		39%	
	Catholic	59		61%	
	Other	15			
	Total	111			

2006 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 the Northern Ireland Service fair employment surveys. Local managers met with the Service 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 Newsletter, both typically Protestant papers. The company also uses the Internet and its intranet. 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 are represented on its interview panels, but it admits that it is often difficult to do so given its size. 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 the Northern Ireland Service 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: Protestants are underrepresented in the work force overall and among managers and associate professionals. The company did not indicate what it considers to be an appropriate catchment area for its employees, apart from noting that managers and professionals are recruited from all areas within Northern Ireland. More than half of the staff at Openwave live in Belfast and only three employees live outside of Northern Ireland (one employee commutes from the Republic of Ireland and two others live outside of the island). In past monitoring periods, the company has reported a relatively high percentage of employees who do not classify

themselves as either Protestant or Catholic because they are foreign-born workers from mainland Europe, Asia and Africa. In the most recent monitoring period, Openwave reported 15 workers without an identified religion, which is about 14 percent of the total work force.

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. The Northern Ireland Service compared managers, professionals and sales associates to all of Northern Ireland and associate professionals and administrative staff to the Belfast travel-to-work area. This comparison put the ideal Protestant representation at about 66 percent, but their portion of the work force at Openwave is less than 40 percent.

The company had 119 applicants in 2006; a large increase from the 38 applicants it had in 2005. Protestants were underrepresented among applicants to associate professional positions for the past two years. In 2005, Openwave hired 10 workers and both communities appeared to be fairly represented. In the most recent monitoring period, however, Openwave hired 10 associate professionals and Protestants only accounted for 3 of those new hires. The company also hired a manager and an administrative worker. There have not been any redundancies in the last two years.

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 affirms each year in its survey response that its policies reflect the principles and it will comply with monitoring by the Northern Ireland Service.

Affirmative action outreach: In 2004, Openwave reported that it has updated its existing affirmative action agreement with the Equality Commission. Two years later, when asked whether the it reached an affirmative action agreement, it responded that the question was not applicable to Openwave. The status of the affirmative action plan mentioned in previous years is unclear and the company has not make any progress towards boosting the percentage of Protestants in the work force, even though it annual hires staff for positions in the association professional category.

Nevertheless, Openwave does make use of some affirmative action measures. The company places EEO statements in job postings. 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."

Any affirmative action efforts the company might consider should be aimed at increasing the number of Protestants among managers and associate professionals.

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 the Northern Ireland Service that 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: No recent complaints have been filed against the company at the Fair Employment Tribunal.

PepsiCo

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	3/06	Affirmative Action	Unknown	FET Settlements	0

- **Walkers Snacks Ltd.**

Location	Antrim				
Business	Crisps				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of 2006)				
	Protestant	22		73.3%	
	Catholic	8		26.7%	
	Other	8			
	<hr/>				
	Total	38			

2006 Survey Response: full

Available information: The company has a small operation that sells and distributes snacks, such as potato chips, in Northern Ireland. PepsiCo UK & Ireland began selling Walkers Crisps in Northern Ireland in 1997 through a third-party distributor, LMI. PepsiCo UK bought LMI's sales and marketing operations in 2003.

The Northern Ireland Service received the company's first survey response in 2006.

Compliance with NI fair employment law and Code of Practice: The company's policies adhere to the fair employment laws in Northern Ireland. In the company's Human Rights Workplace Policy, it says, "we comply with all applicable laws, regulations, and other employment standards, whenever we operate or work." The policy also includes the statement, "we do not tolerate discrimination and work to ensure equal opportunity for all associates."

PepsiCo also provided a copy of its Code of Conduct, which contains information on its grievance procedure and informs employees about methods they can use to address concerns. One method is the ethics hotline available toll free to all employees worldwide.

PepsiCo also provided details on its human resources procedures. The company notifies all of its employees when positions become available, but it does not publicly advertise all job openings. When it does widely advertise job availability, it uses the local newspapers, the Internet, Trade publications and the company intranet. Walkers always uses an interview panel of employees who have been trained in EEO issues when selecting candidates, but it did not indicate if it seeks to ensure that both communities are represented on the panel or whether it examines applicants' backgrounds to determine success rates by community. This practice is often used by companies to make sure the candidate selection process is not biased. When redundancies are necessary, the company uses performance selection criteria or specifies the role that will be eliminated. When selecting employees for promotion, the company evaluates skill sets, performance criteria, future potential and personal development goals. Training opportunities are based on providing specific skills to those whose roles are suited for the skill set.

Underrepresentation analysis: Both communities appear to be fairly represented in the work force.

Conformance with MacBride principles: The company agreed in spring 2006 that it will cooperate with monitoring of its operations in Northern Ireland and said that its policies comply with the MacBride principles. It completed the Northern Ireland Service survey in 2006

Affirmative action outreach: No affirmative action measures appear warranted at this time. The company reported that it will be completing a review with the Equality Commission this year and will work with the Commission on any needed affirmative action measures.

Chill factor and neutral workplace: The company reported that its worldwide code of conduct "includes a policy of zero tolerance for violence." All company managers and supervisors receive training on potential sectarian harassment and intimidation in the workplace as laid out in company policies.

Grievances: No fair employment grievances have been filed against the company at the Fair Employment Tribunal. The company has grievance procedure that lays out the steps for employees to take if there is an issue they want addressed. Employees can raise issues with their immediate supervisor or the next-level manager. The policy outlines a clear timeframe to handle grievances and informs employees that a colleague and/ or a representative from human resources may assist them in this process.

Pfizer

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	5/00	Affirmative Action	NA	FET Settlements	0

• Pfizer UK

Location	employees work from home		
Business	pharmaceutical sales/ animal health sales		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of June 2006)		
	Protestant	15	52%
	Catholic	14	48%
	Other	8	
	<hr/>		
	Total	37	

2006 Survey Response: full

Available information: Pfizer has responded in full to the annual Northern Ireland Service 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. In 2003, Pfizer acquired Pharmacia, which had fewer 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 37 and has remained steady around a few workers shy of 40 for the last couple of years. The company only employs sales representatives, who work 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 an "Equal Opportunity Code of Practice," which it observes when recruiting in Northern Ireland and elsewhere. Pfizer 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 comprised of employees who have received EEO training, but both communities are not necessarily represent 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. 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 shared by Northern Ireland senior management, U.K. management, corporate headquarters and the corporate board.

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 48 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 monitoring by the Northern Ireland Service 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.

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

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	No	FET Settlements	0

• Raytheon Systems

Location	Derry, Co. Londonderry		
Business	software development center		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of April 2006)		
	Protestant	11	30%
	Catholic	27	71%
	Other	0	
	<hr/>		
	Total	38	

2006 Survey Response: full

Available information: The company has sporadically responded to the Northern Ireland Service survey. In 2005 it provided updated employment figures and in the most recent monitoring period it submitted a full survey response. Employment appears to have fallen short of initial goals, and the company announced in 2003 that there would be some redundancies. Raytheon's work force has remained steady for the last three years at slightly less than 40 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 has provided the Northern Ireland Service 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." It alerts all employees to job opportunities, but it does not always publicly advertise them. When jobs are advertised, Raytheon uses the Belfast Telegraph, other local papers, the Internet, the company intranet and a recruitment agency. Personal who select candidates for hire have received EEO and the company sometimes reviews its applicant pool to determine success rates by community. Managers occasionally consult with trade unions or other worker representatives on equality issues.

U.K. managers oversee the company's equality policy.

Underrepresentation analysis: Protestants have appeared to be slightly underrepresented in the past, but the most recent figures indicate both communities are fairly represented.

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, which it says "reflect the intent of the MacBride principles." In the most recent survey response, Raytheon reported that it would respond to further survey requests from the Northern Ireland Service.

Affirmative action outreach: No 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. Managers and supervisors receive training on anti-sectarianism and intimidation using materials from the Equality Commission. Raytheon says it has "a harmonious working environment policy and an inclusive culture which encourages openness." The company has also reported that it actively promotes its "stance against any form of harassment and banning display of any contentious material including slogans, banners and football colors."

Grievances: No complaints have been filed against the company at the Fair Employment Tribunal. The company reported that its grievance procedure allows employees to file confidential complaints, to raise complaints with someone other than an immediate supervisor, and it will accommodate requests to bring grievances to a co-religionist.

Sanmina-SCI

MacBride Agreement No **Underrepresentation** Yes **FET Discrimination Findings** 0

Agreement Date NA **Affirmative Action** Unknown **FET Settlements** 0

• 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 2004)		
	Protestant	259	63%
	Catholic	77	37%
	Other	11	
	<hr/>		
	Total	347	

2006 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 the Northern Ireland Service survey. Privately held Electronic Manufacturing Systems responded once to the survey, in 1999. EMS had acquired Bemac Engineering, located just outside Belfast in Lisburn, and established it as its European headquarters in 1997.

The work force grew from 332 workers in 2003 to 347 workers in 2004.

Compliance with NI fair employment law and Code of Practice: Recent information is unavailable given the company's failure to respond to inquiries.

Underrepresentation analysis: Catholics are significantly underrepresented in the work force at Sanmina-SCI when it is compared to Northern Ireland as a whole, the Lisburn district council area or the Belfast travel-to-work region. Catholics accounted for 15 of the 40 new hires in 2004, according to the most recent available data. In 1999, the company reported that turnover among managers, professionals and technical staff was limited, but the company has annually hired roughly 50 new employees for the last few years. Catholics were fairly represented among new hires in 2004 and 2002, but in 2003 they accounted for only eight of 49 appointees with identified religion.

Conformance with MacBride principles: The company does not have an agreement to implement the MacBride principles.

Affirmative action outreach: The company report in 1999 that it was conducting affirmative action measures, but these efforts do not appear to be working. It is unclear if the company has an updated affirmative action plan or whether they are still implementing the measures taken seven years ago.

Chill factor and neutral 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: Since 2003, two complaints have been filed against the company at the Fair Employment Tribunal. Both complaints were conciliated.

Schein (Henry) Inc.

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	NA	FET Settlements	0

• **Henry Schein K.M. Ltd.**

Location	Belfast	
Business	dental supplies	
Fair Representation	Neither community appears to be underrepresented	
Employees	(Data as of July 2004)	
	Total	11

2006 Survey Response: none

Available information: The company last responded to the Northern Ireland Service 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 September 2006 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 information on the work force breakdown is available) when compared to a range of possible catchment areas. The company has not taken a position on the MacBride principles and reported 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. 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.

Sonoco Products

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1991	Affirmative Action	NA	FET Settlements	0

• Sonoco UK

Location	Lurgan, Co. Armagh		
Business	converted paper tubes		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of June 2005)		
	Protestant	17	45.9%
	Catholic	20	54.1%
	Other	0	
	Total	37	

2006 Survey Response: none

Available information: Sonoco consistently responded to the Northern Ireland Service survey until this year. Company officials met with Northern Ireland Service staff 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.

Starbucks Corp.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	8/06	Affirmative Action	NA	FET Settlements	0

- **Starbucks**

Location	Belfast (4 locations) and Coleraine		
Business	coffee		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of June 2006)		
	Protestant	29	64.4%
	Catholic	16	35.6%
	Other	16	
	<hr/>		
	Total	61	

2006 Survey Response: full

Available information: Starbucks Coffee Company recently opened operations in Northern Ireland and quickly expanded. It now operates nine stores in Northern Ireland, six in Belfast, one in Antrim and another in Ballymena. The company employs 122 workers, about half of which work on a full-time basis. Starbucks completed the Northern Ireland Service survey in 2006, providing detailed information on its staff and copies of its employment policies.

Compliance with NI fair employment law and Code of Practice: Starbucks' policies appear to be largely in line with the Code of Practice. It advertises all available positions to its employees and publicly using the Belfast Telegraph, the Newsletter, other local newspapers, the Internet and show windows. Starbucks includes an EEO statement in its ads and all employees who select candidate receive EEO training. When interviewing candidates, the company always uses a panel but it does not ensure both communities are represented. It reported, "We do not ask panel members to disclose their religious or political background. However, we intend to review this practice." Management in Northern Ireland and the human resources team is responsible for overseeing the EEO issues.

The company provided the Northern Ireland Service with copies of its EEO and harassment/ bullying policies. The EEO appears to have been customized for the UK and Ireland because it mentions, in addition to the standard EEO classifications, that it will not discriminate against members of the traveling community. It does now, however, specifically deal with sectarian issues. The harassment/ bullying policy outlines specific offenses that are inappropriate and how they are dealt with. Offenders who are found guilty of violating the policy could merely receive a warning or ultimately be dismissed.

Underrepresentation analysis: Both communities appear to be fairly represented at the company. Catholics account for almost 36 percent of the staff, which is in line with the 42.7 Catholic catchment area for the economically active in Northern Ireland. Starbucks recently submitted its first fair employment monitoring return to the Equality Commission and it reported that "it will be reviewing the content of the return in order to assess fair participation in its work force in Northern Ireland."

Conformance with MacBride principles: Starbucks reported that it is working towards bringing its policies in line with the MacBride principles. "We believe our company policies, including our equal employment and non-discrimination policy, as well as our company guiding principle of treating all partners with respect and dignity, entirely reflect the fair employment standards embodied in the MacBride principle," the company reported, stipulating that it has "been in the market for less than two years and is therefore still working toward specific compliance with all of the principles." Starbucks reported that it aims to amend its policy to include a discussion of

sectarian emblems and to appoint staff to deal directly with the principles by the next monitoring period. The company reports that employees are encouraged to raise concerns about fair employment issues. Starbucks has a business conduct hotline for those who wish to be anonymous. "When complaints are received," Starbucks reported, "we have procedures in place to ensure there is prompt investigation and effective response."

Affirmative action outreach: No affirmative measures appear to be warranted.

Chill factor and neutral workplace: Starbucks reported that its current store locations in Northern Ireland are in towns or city centers and that it has not "had the requirement to make any specific security arrangements for staff." It also informed that it permits workers to go home early and it will close shops in the event of any security alert or evacuation. Six of the nine Northern Ireland stores are in Belfast and the remaining three are in Antrim, Ballymena and Coleraine. Most of the sites are relatively neutral and predominately Protestant, which should not cause a serious chill effect for members of the Catholic community.

Grievances: No grievances have been filed against the company at the Fair Employment Tribunal. Starbucks has a grievance procedure that allows for employees to contact an independent employee relations representative through a hotline if they do not want to address the complainant with their immediate supervisor. Employees can also bring a colleague of their choosing to a grievance hearing, which may increase comfort for employees who want to be accompanied by a fellow-community member. The procedure ensures that grievances are dealt with in a timely manner, but it only allows for one appeal to a management decision.

Terex

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	11/02	Affirmative Action	Yes	FET Settlements	0

- **Powerscreen International Distributors Ltd.**

Location	Dungannon, Co. Tyrone		
Business	engineering		
Fair Representation	Protestants appear to be underrepresented		
Employees	(Data as of March 2006)		
	Protestant	36	16%
	Catholic	191	84%
	Other	43	
	Total	270	

2006 Survey Response: partial

Available information: Terex responded in full to the Northern Ireland Service surveys between 2000 and 2002, but has not completed the survey since then. In 2006, it provided a copy of its Fair Employment Monitoring Return, which listed the subsidiary operation as Powerscreen International Distributors Ltd. The company has previously reported under the name Finlay Hydrascreens (Omagh). Press reports indicate Terex reorganized its various divisions to boost efficiency and it seems likely that it is reporting its Northern Ireland operations under the Powerscreen International Distributors name. Terex bought Powerscreen PLC, the former parent of Powerscreen International Distribution Ltd., in 1999, after an accounting scandal at the former parent company. Terex has a MacBride agreement, which lapsed for a time, but its recent cooperation has reconfirmed its compliance with the principles. The Northern Ireland Service met with company representatives in Northern Ireland in 2000.

Terex's 2006 Form 10-K, filed with the Securities and Exchange Commission, indicates that the company has a variety of other companies active in Northern Ireland: Finlay Hydrascreen (Omagh) Limited, Matbro (N.I.) Limited, Powerscreen International Distribution Limited, Powerscreen Manufacturing Limited, Terex International Financial Services Company. Powerscreen International is the only company listed with the Equality Commission as an employer with more than 10 workers. Equality Commission officials reported that the company appears to employ most of its workers as contractors. The company reported that 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 reported in 2002 that it complies with Northern Ireland fair employment law and the recommendations and legal requirements of the Code of Practice. The Equality Commission has provided materials for non-sectarian training for all employees, including subcontractors and their employees.

The company advertises 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.

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: Protestants appear to be underrepresented in the work force. Managers and professionals are compared to a catchment area that includes all of Northern Ireland and is about 57 percent Protestant and the remaining employees in other job categories are compared to the Dungannon, which has a working-eligible Protestant portion of about 32 percent. Protestants comprise only 16 percent of the work force at Terex in Northern Ireland. Protestants were also underrepresented among applicants and appointees in 2006.

Conformance with MacBride principles: The company reached an agreement to comply with the MacBride principles in Nov. 2002. It previously allowed the commitment to lapse, but it provided a copy of its Fair Employment Monitoring Return to the Northern Ireland Service in 2006.

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 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: Powerscreen International Distributors is in Coal Island, Dungannon, a Catholic enclave in a relatively mixed council area. The site could be off-putting to Protestants traveling to work in this area.

Finlay Hydrascreens is in a 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. 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: No recent complaints have been filed against the company at the Fair Employment Tribunal.

Terex

MacBride Agreement Yes **Underrepresentation** No **FET Discrimination Findings** 0

Agreement Date 11/02 **Affirmative Action** Yes **FET Settlements** 0

• **Finlay Block-Making Equipment Ltd.**

Location Dungannon
Business concrete block manufacture
Fair Representation Neither community appears to be underrepresented
Employees (Data as of 2004)

Protestant	17	47.2%
Catholic	19	52.8%
Other	2	
<hr/>		
Total	38	

2006 Survey Response: partial

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 38 workers as of 2004. Finlay has not responded to inquiries from the Northern Ireland Service.

Compliance with NI fair employment law and Code of Practice: The company did not provide 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: The company has no agreement on compliance 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: No fair employment grievances have been filed against the company.

TJX

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	No	FET Settlements	0

- **T.K. Maxx**

Location	Belfast				
Business	retail clothing sales				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	91		60%	
	Catholic	60		40%	
	Other	4			
	Total	155			

2006 Survey Response: full

Available information: The company gave a complete response to the Northern Ireland Service survey in 2005 for the first time since 1998, providing information on its fair employment policies and its work force. It responded again in 2006 when it reported a work force of nearly 160 employees, a 33 percent increase from the previous monitoring period.

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.

Applicants and new hires in the 2005 monitoring period were heavily Catholic, 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 the Northern Ireland Service 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 ten T.K. Maxx stores in Northern Ireland, some in areas that could pose a chill factor for one of the communities. In August of this year, Republican splinter group, the Real IRA claimed responsibility for fire-bombing a TK Maxx store in Newry, County Down as well as three other stores. Press reports indicate the bombing caused severe damage to the store, but no deaths or injuries. The group's attack was done in remembrance of the anniversary of the now-defunct British policy of internment, whereby suspected offenders could be jailed without trial. Another press report revealed that a truck carrying T.K. Maxx merchandise was hijacked in Co. Louth in April.

The location of the store in central Belfast would not pose a chill factor for either community. The Newtownabbey location is in a predominantly Protestant area, 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.

TJX faced harsh criticism from Unionist in late 2005 when it banned employees from wearing poppies to work. The poppies are traditionally worn by Britons during the month of November in remembrance of the British Armed Forces. TJX responded that the poppy was banned as part of its policy that prohibits emblems at in the workplace. The company president responded that he would review the ban and consult the Equality Commission to determine whether to lift the ban. Press reports do not indicate that the policy was changed.

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.

United Technologies

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	1/01	Affirmative Action	Yes	FET Settlements	0

• Chubb (NI) Ltd.

Location	Belfast				
Business	security and fire				
Fair Representation	Catholics appear to be slightly underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	91		73%	
	Catholic	34		27%	
	Other	4			
	Total	125			

2006 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. Its operations are headquartered in Dublin and company representatives told the Northern Ireland Service in a meeting held in 2005 that all policies and activities are run on an all island basis. Chubb's only Northern Ireland site is located in Belfast. Since UTC's acquisition, the company has consistently responded to the Northern Ireland Service annual survey. Company representatives said they expect sustained peace in Northern Ireland will spark increased investment and demand for their products.

Compliance with NI fair employment law and Code of Practice: Chubb provided copies of its EEO, grievance, affirmative action and harassment policies to the Northern Ireland Service, all of which are in line with fair employment laws in Northern Ireland. The company reported that it used the Northern Ireland Service's 2004 profile to help revise its Equal Opportunities Policy to "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."

Chubb publicly advertises all job openings and posts them internally to alert staff. It includes an EEO statement in job advertisements and posts them in Belfast Telegraph, the Irish News, the Internet, the company intranet and in other local newspapers. It also reviews the religious composition of applicant pools and new hires to determine success rates by community.

In a meeting with the Northern Ireland Service in 2005, Chubb representatives said European Union regulations make it difficult to maintain balance in the community representation of the work force, specifically among the security staff. To ensure security guards do not lose their jobs in the event that a new company wins a contract to provide security service, essentially EU regulations require companies to hire employees along with a winning contract. This allows guards to maintain their jobs even if their company sells a contract to provide security. Company representatives said, "Dismissals are only permitted if they are for technical, organizational or economic reasons. 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." Chubb has hired a recruitment officer for the Belfast office to replace local management in overseeing recruitment. The officer reports directly to the human resources department in Dublin.

All Chubb 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 make sure those opportunities are implemented at the at the operational level.

Underrepresentation analysis: In past years, Catholics were significantly underrepresented in the work force overall and in several employment categories. Catholic representation dropped substantially between 2001 and 2004, 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 shrank by 9 employees. In a meeting with the Northern Ireland Service in 2005, Chubb representatives acknowledged this underrepresentation and described the affirmative action plan designed to boost the Catholic portion of its staff. In 2005, Catholic representation nudged up to just over 18 percent. In the most recent monitoring period, Catholics still appear to be slightly underrepresented, but to a much lesser degree than in previous periods. A slight modification in the work force, such as the hiring of six additional Catholic employees, would bring the community representation into balance. Chubb commented in its most recent survey response, "Our affirmative action programs have shown an increase in the Catholic representation numbers since the last survey report. We continue to closely monitor our staffing levels to ensure we gain the maximum equitability in relation to representation of communities."

Until recently, the vast majority of hires were Protestants despite the continual underrepresentation of Catholics. In the most recent monitoring period, about 27 percent of the 64 new hires were Catholics, which is in line with the 34 percent figure that represents the ideal Catholic representation according to census figures.

The company reports that its ideal Catholic representation is between 25-35 percent, given its location in a "legacy Protestant area of Belfast." This figure is somewhat low considering the accessible location of the company and census data that indicates the Catholics portion of the work force within traveling distance of the company is about 37 percent, but the figure greatly exceed the 10 percent figure referred to by the company as recent as 2004.

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. These developments do not vitiate the company's affirmative action obligations, however.

Conformance with MacBride principles: In a meeting with the Northern Ireland Service in 2005, Chubb said it would incorporate the MacBride principles into its policies by this year and in most recent survey response Chubb reported that its policies reflect the principles and it agreed to complete the annual survey.

In 2005, company representatives told the Northern Ireland Service that that emblems have been disallowed from the workplace. UTC's other companies have successfully implemented the MacBride principles. Chubb representatives told the Northern Ireland Service that implementing the MacBride principals and fair employment regulations became a priority in 2005. Chubb has submitted copies of its policies to the Northern Ireland Service. The EEO policy says Chubb 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.

Affirmative action outreach: In the past, Chubb told the Northern Ireland Service 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 expand its recruiting efforts more aggressively for underrepresented groups." In 2005, company representatives told the Northern Ireland Service that its goal is to increase the Catholic percentage of the work force by a few percentage points by June 2006. It has succeeded in these efforts and the community representation of its staff is much more balanced than in recent history. Chubb's affirmative action policy sets out a process by which community representation of the staff will be monitored

annually to determine whether there is an imbalance and if affirmative action measures are necessary. According to the document, "the plan shall be reviewed and measured twice yearly and additional actions shall be developed to address any factors limiting success."

Chubb began advertising in the Irish News in 2005 to "attract a greater number of applicants from this readership," which are a majority Catholic. It also includes that statement, "We are an Equal Opportunities Employer" in any form of job advertisement as well as using job markets in predominately Catholic areas. As part of its affirmative action efforts, company representatives told the Northern Ireland Service that they were 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 the Northern Ireland Service. 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 the company's fire extinguishers were removed in 2005.

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

Chubb and the trade union representing its workers have developed a grievance policy, which includes provisions for a formal hearing and/or the use of an arbitration body. The UTC dialog and ombudsman programs also provide a confidential and secure environment for employees to raise complaints.

United Technologies

MacBride Agreement	Yes	Underrepresentation	Maybe	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	Catholics may be underrepresented				
Employees	(Data as of Aug. 2006)				
	Protestant	34		73%	
	Catholic	12		27%	
	Other	4			
	<hr/>				
	Total	50			

2006 Survey Response: full

Available information: Otis Elevator has consistently responded to the Northern Ireland Service survey.

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: Catholics appear to be slightly underrepresented at the company and among skilled workers, where Catholics account for only a quarter of the 36 employees whose community affiliation has been identified. The ideal Catholic representation for this employment category is about 43 percent considering both the percentage of Catholics employed in the category throughout Northern Ireland and given that the entire region is a fair catchment area. If, however, the skilled workers at Otis are compared to a smaller catchment area that only includes the Belfast travel-to-work area the nine Catholic workers appear well represented. The ideal Catholic representation among skilled staff for the smaller catchment area is about 12 people, just three more than the actual representation. The company has said in the past that it has had difficulties finding skilled Catholic lift engineers with prior experience, but that it was addressing this issue through an engineering apprentice program. The applicant figures reported by the company reflect this problem. Protestants accounted for two-thirds of the applicants in the most recent monitoring period and more than 80 percent of the new hires whose community affiliation has been identified.

The company reported that it considers an appropriate Catholic representation to be 29.4 percent, but it is unclear how this percentage was derived since it also reported that it employs people from all district council areas.

The company hired seven people in the most recent monitoring period, which is a jump from the total of five new hires in the three previous years. In 2004, it let go nine workers, including six Protestants and three Catholics; it has not had any redundancies since.

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: The company should pay close attention to the representation of Catholics within the skilled labor employment category and implement affirmative action measures if the underrepresentation continues.

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." The company's survey response indicated that its grievance procedure also allows employees to file a complaint confidentially. It also informs staff that they may raise issues with someone other than a direct supervisor or someone of the same community background.

United Technologies

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1/01	Affirmative Action	Yes	FET Settlements	0

• Toshiba Carrier UK

Location	Belfast
Business	air conditioning/refrig. installation & maintenance
Fair Representation	Neither community appears to be underrepresented
Employees	(Data as of Aug. 2006)
	Total 10

2006 Survey Response: full

Available information: Toshiba Carrier regularly responds to the Northern Ireland Service survey. Employment at the company has remained steady at around 10 employees for the last several years.

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 has provided copies of its policies to the Northern Ireland Service. 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, displayed on notice boards and available on the company intranet.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. The company hired an additional worker in 2005 and another in 2006.

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, UTC 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: A company representative reported that it moved locations within Belfast "specifically so that we could operate in a more neutral area of the city."

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

Vornado Realty Trust

MacBride Agreement	Unknown	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	NA	FET Settlements	0

• **Toys 'R' Us**

Location	Newtownabbey		
Business	toy retailing		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of Oct. 2005)		
	Protestant	27	64.3%
	Catholic	15	35.7%
	Other	2	
	<hr/>		
	Total	44	

2006 Survey Response: full

Available information: Toys R Us was acquisition by an investor group led by Bain Capital, Kohlberg, Kravis Roberts and Vornado Real Estate Investment Trust in mid-2005. The company's initial response to monitoring by the Northern Ireland Service came in 1999, when it also met with Service staff at its north Belfast store. The 30,000-square-foot store sells toys, baby care and family leisure and home entertainment multimedia products. The company has been operating in Northern Ireland since 1997 and its work force has fluctuated over the last several years, from a high of 69 in 1997 to a low of 41 in 2005. Toys R Us reported 44 workers as of October 2005.

Compliance with NI fair employment law and Code of Practice: The company says it is an equal opportunity employer and fully complies with all aspects of Northern Ireland fair employment law. Its policies and programs appear to be consistent with the Fair Employment and Fair Treatment Order 1998 and the Code of Practice. It reports "all procedures and policies were agreed with the FEC prior to any recruitment commencing." Managers attend Equality Commission training, and the company posts its policies in all stores. The company always notifies all employees about positions open to internal applicants, and all employees receive training on equal employment issues. Toys R Us does not need to advertise job widely; signs posted in its Belfast store generate sufficient numbers of applicants. When using panels for job interviews, the company ensures that both communities are represented. It also says it systematically tracks applicant success rates by religion. The company promotes employees by merit and typically promotes from within for managerial posts.

Toys R Us has an equal opportunities policy that says "all recruitment, promotion and training will be based upon an individual's ability and job performance and will exclude any consideration of an applicant's/employee's religious beliefs, political opinion, race, sex, marital status or disability....Toys R Us will not directly or indirectly discriminate on the grounds of religious belief or political opinion....Breaches of this policy will be regarded as a disciplinary offense." Local management is responsible for complying with local fair employment legislation and, as recommended by the Equality Commission, direct responses to questions about religious affiliation are sent to independent personnel departments at the head office, according to the company. A confidential help line also exists for employees to voice questions or concerns.

Underrepresentation analysis: Neither group appears to be underrepresented at the company overall when its work force is compared to a catchment area that includes all of Northern Ireland. Employees at Toys R Us are either managers or sales associates and both of these employment categories have the widest recruitment area. The company is opening an additional store in Londonderry, but the monitoring figures for 2006 only reflect workers at the Belfast store. When Northern Ireland Service staff met with the company representatives in October 2006, candidates for the staff at the Derry store were in the interview process. Toys R Us reported 10 new hires in the

most recent monitoring period and both communities appeared fairly represented in the figures. The company also reported 170 people applied for jobs at Toys R Us, which would include holiday workers. (Toys R Us doubles its work force during the holiday season.)

Conformance with MacBride principles: Toys R Us reached an agreement on implementation of the MacBride principles in April 1999, saying that it was "taking all lawful measures to implement the fair employment standards embodied in the MacBride principles," prompting the withdrawal of a 1999 shareholder resolution on the subject. The Securities and Exchange Commission had rejected the company's challenge to the proposal.

Despite the company's agreement on MacBride implementation, Toys R Us declined to provide data on the religious composition of its work force until 2006. (It said it could not report of the religious composition of its work force and still maintain employee confidentiality as required by Northern Ireland's fair employment law.) The Northern Ireland Service temporarily considered the company not compliant with the principles and changed its determination when the company provided work force data in 2006.

Affirmative action outreach: No affirmative action efforts currently appear warranted given the work force breakdown at the company. The company's EEO policy commits it "to adopt, where practical, affirmative action measures to ensure the provision of equality of opportunity and fair participation of Roman Catholics and Protestants."

Chill factor and neutral workplace: Neither community appears uncomfortable contemplating employment at the Toys R Us Belfast store, according to the company, but the Belfast store is located in a predominately Protestant neighborhood which could be off-setting to Catholics. Workers traveling from the city center to Newtownabbey pass Unionist paramilitary murals. The EEO policy commits Toys R Us "to the maintenance of a good and harmonious working environment in which no worker feels under threat or intimidated because of his/her religious belief or political opinion, e.g., Toys R Us prohibits the display of flags, emblems, posters, graffiti, or the circulation of materials or the articulation of slogans or songs which are likely to give offence or cause apprehension among particular groups of employees." Toys R Us also issues a Sectarian Harassment at Work employee guide that defines sectarian harassment and outlines prevention measures and grievance procedures. The company conducts workshops on harassment and intimidation in the work force for all employees.

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

Wal-Mart Stores Inc.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	12/2006	Affirmative Action	NA	FET Settlements	0

- **ASDA**

Location	13 locations across Northern Ireland		
Business	supermarkets		
Fair Representation	Neither community appears to be underrepresented		
Employees	(Data as of Dec. 2006)		
	Protestant	865	55.5%
	Catholic	694	44.4%
	Other	4	
	<hr/>		
	Total	1563	

2006 Survey Response: full

Available information: Wal-Mart acquired Asda in 1999, which bought 13 Safeway stores in mid-2005 from William Morrison. These stores operate as Asda. The company has 13 locations throughout Northern Ireland and employs the largest work forces in the region. The Northern Ireland Service surveyed Wal-Mart for the first time in 2006 and it responded in full.

Compliance with NI fair employment law and Code of Practice: Asda did not provide a copy of its EEO policy to the Northern Ireland Service, but the policy as described by the company is in line with fair employment standards. Asda has won several awards for its positive work environment, including "best place to work awards" from Fortune magazine, and The Sunday Times newspaper, and it says it "works tirelessly to continue to earn and maintain that reputation." Asda reports that it, "actively promotes fair treatment and opportunity from all the recruitment and selection to training and promotion." It consults with a union that represents its workers on a monthly basis and it uses a software package recommended by the Equality Commission to monitor its work force.

Asda notifies all employees of job opportunities. When the company publicly advertises available positions, it uses a range of methods that ensures wide distribution, including the Belfast Telegraph, the Irish News, the Newsletter, other regional newspapers, job markets and the company intranet. Asda typically promotes from within for managerial positions. To select candidates, the company uses an interview panel comprised of employees who have received EEO training. It attempts to ensure both communities are represented on panels but reports this is not always possible.

Asda has not made any workers redundant, but its policy for this considers tenure. "Whilst length of service....will be one of the criteria for redundancy selection; management have the right to also consider relevant skills, experience and other matters in making the final selection. The mutual objective is to preserve a properly balanced and efficient workforce."

Senior managers, human resources and employees in the legal department oversee EEO issues.

Underrepresentation analysis: Both communities appear to be fairly represented in the work force as ASDA. The company has 13 locations throughout Northern Ireland, making the region as a whole the best comparison for composition of the staff. Asda has only four workers whose religion is not identified, indicating that the company's monitoring process is comprehensive and accurate. Catholics account for about 44 percent of the staff with identified religion, which is in line with the 42.7 percent Catholic share of the available work force. Asda agrees that its work force should be compared to all of Northern Ireland as it "undertakes a multi-site retail operation throughout Northern Ireland and requires its managers to be flexible in terms of work location."

Conformance with MacBride principles: In its 2006 survey response, Wal-Mart reported that its policies adhere to the standards embodied in the MacBride principles and it agreed to comply with monitoring by the Northern Ireland Service. Asda notes that, "it does not provide security for the protection of its employees while traveling to and from work as this is not currently required in practice. Should the need arise in the future then Asda would be prepared to allocate resources to provide this protection." The MacBride principles do not require employers to provide protection while traveling to and from work, but the principles call on companies to make reasonable efforts in the regard where possible. For example, some employers located in contentious areas provide security cameras in employee parking lots.

Affirmative action outreach: No affirmative action measures are warranted at this time.

Chill factor and neutral workplace: The company has locations throughout Northern Ireland and should not pose any overall chill factor to either community. Asda has a harassment and bullying policy, which the company reports, disallows such action on the basis of community, religious and political grounds and "provides that employees can discuss their problems in the strictest of confidence with their human resources representative" and/or union representative.

Grievances: No complaints have been filed against Asda since 2003. The company did not share a copy of its grievance policy with the Northern Ireland Service, but it reports that the procedure has five stages that include several options of an appeal to a decision rendered. Asda specifies that, "any particular stage can be omitted with the consent of the employee," such as in a case where a worker prefers not to bring a complaint to their immediate supervisor. Workers may raise issues with their human resources representative and/or to their union representative.

Watson Pharmaceuticals

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	1/02	Affirmative Action	NA	FET Settlements	0

• Nicobrand Ltd.

Location	Coleraine				
Business	bulk chemical processing				
Fair Representation	Neither community appears to be underrepresented				
Employees	(Data as of Sept. 2006)				
	Protestant	19		76%	
	Catholic	6		4%	
	Other	1			
	Total	26			

2006 Survey Response: full

Available information: Nicobrand consistently responds to the Northern Ireland Service survey. In April 2004, the company received the top U.K. business award, the prestigious Queen's Award for Enterprise. The Service first became aware of the company's presence in Northern Ireland through press reports in 2001. Nicobrand operates in a 10,000 square foot bulk chemical processing facility in Coleraine. Staff levels are remained stable for the last few years at around 27 employees.

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, using local and regional newspapers and always notifies employees about positions open to internal applicants. When selecting candidates, Nicobrand uses an interview panel comprised of members of both communities who have received EEO training. Applicants are reviewed to determine success rates by religion; a useful check to ensure a bias has not crept into the system. The company uses materials from the Equality Commission to conduct workshops for managers and supervisors on sectarian harassment and intimidation in the workplace. Senior managers in Northern Ireland oversee equal employment programs.

Underrepresentation analysis: The Northern Ireland Service does not draw any conclusions from statistical assessments on work forces that have less than 30 employees.

Still, 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 Catholics has fallen by a couple of employees each year, but the community still appears to be well represented. In the most recent monitoring period, the vast majority of applicants were Protestants as were the new hires. There have not been any redundancies for the last several years.

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. In the 2006 survey response, Nicobrand reported that the company, "Ensure[s] all managers are aware and comply with Northern Ireland fair employment practices."

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: The Northern Ireland Service 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 the Northern Ireland Service with a brief description of its grievance policy in 2005. The policy allows for employees to raise confidential complaints and to raise issues with someone other than their immediate supervisor, which may include someone of the same community background. The company reports that concerns are always "investigated fully." The policy lays out specific timelines and procedures to follow when grievances arise. The procedure allows for an appeals process.

Yum Brands

MacBride Agreement No Underrepresentation Yes FET Discrimination Findings 0

Agreement Date NA Affirmative Action Unknown FET Settlements 0

• Herbal Restaurants

Location	province-wide		
Business	KFC fast-food restaurants		
Fair Representation	Catholics appear to be slightly underrepresented		
Employees	(Data as of 2004)		
	Protestant	576	61%
	Catholic	368	39%
	Other	12	
	<hr/>		
	Total	992	

2006 Survey Response: none

Available information: Yum Brands has declined to respond to the Northern Ireland Service fair employment survey and has said only that its franchisee follows Northern Ireland fair employment law. Most recently, the company said in its 2006 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 the Northern Ireland Service 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. The Northern Ireland Service 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 said that Herbal Restaurants has taken some action recently to reform its fair employment practices.

There are 32 KFC locations throughout Northern Ireland. 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 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 said that "political statements" such as the mural are unacceptable to it and requested the franchisee to remove the painting; the mural disappeared two days later in the middle of the night.

Compliance with 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: Catholics appear to be slightly 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 2006 received 10.6 percent support, a drop from 14.7 percent support in 2005. It received 13.4 percent in 2004 and 12.1 percent in 2003. Yum Brands opposed the proposal, saying that the MacBride principles are superseded 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: One complaint filed against the company in 2005 is pending at the Fair Employment Tribunal .

Yum Brands

MacBride Agreement	No	Underrepresentation	Unknown	FET Discrimination Findings	0
Agreement Date	NA	Affirmative Action	Unknown	FET Settlements	0

- **Pizza Hut (UK)**

2006 Survey Response: none

Available information: There are 14 Pizza Hut restaurants in Northern Ireland in Antrim, Ballymena, Bangor, Belfast (6 stores), Carrickfergus, Carryduff, Coleraine, Dungannon and Lisburn. The Northern Ireland Service 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. The Northern Ireland Service estimates that the restaurants employ at least 50 people, and probably more. No fair employment grievances have been filed against the company.

