



State of New Jersey

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January 13, 2011

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

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

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

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

Attached hereto as Exhibit I is the report prepared by ISS, dated December 2010.

A handwritten signature in black ink, appearing to read "T. Walsh".

Timothy M. Walsh
Director

Attachments



Northern Ireland Report

**State of New Jersey Division of Investment
December 2010**

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MacBride Principles Background

The nine MacBride 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.

Northern Ireland Research Background

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

- 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.



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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 MSCI ESG Research 2010 Northern Ireland Service 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;
- 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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3M Company

Operations in Northern Ireland:

3M Industrial Tapes

MacBride Agreement Yes Protestants No FET Discrimination Findings 0
Underrepresented

Catholics No

Underrepresented

Agreement Date Affirmative Action Yes FET Settlements 0

• 3M Industrial Tapes

Location Bangor, Co. Down

Business Adhesive tapes

Employees (Data as of 2010)

Protestant 137

Catholic 19

Other 5

Total 161

2010 Survey Response: None

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 InvestNorthern Ireland, 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's staff now numbers 163 workers.

Compliance with Northern Ireland 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



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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: As of December 2010, neither community appeared to be underrepresented at 3M's operations in Bangor. According to the Equality Commission's 2009 Monitoring Report, the Protestants constituted 87.8 percent of the company's affiliated employees, while Catholics represented the remaining 12.2 percent. 3M's Bangor location is in a heavily Protestant district, with Catholics representing less than 15 percent of the population. The company does not use a last-in, first-out redundancy policy, but bases redundancies on merit or asks for volunteers, which can affect one community disproportionately.

However, current figures do not differ significantly with the community profile of Bangor, the most appropriate catchment area given the company's business type. However, a more detailed breakdown of the company workforce per community could also change this underrepresentation assessment.

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. 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." Previously, in 1997 3M reached an affirmative action agreement with the Equality Commission, which included a target of increasing the Catholic proportion of applicants and appointees to at least 11 percent by 1999, and an overall goal of increasing the Catholic proportion of its manual work force to 11 percent. 3M met these goals and generally has exceeded its target for Catholic applicants. It began welcoming both communities to apply in 1996. The 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.



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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: As of December 2009, the Northern Ireland Service is not aware of any complaints filed against the company at the Fair Employment Tribunal.

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AVX Corporation

Operations in Northern Ireland:

AVX Ltd.

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

• **AVX Ltd.**

Location	Coleraine
Business	Multilayer ceramic capacitor mfg.
Employees	(Data as of 2010)
	Protestant 254
	Catholic 77
	Other 14
	Total 345

2010 Survey Response: None

Available information: The company has regularly responded to the Northern Ireland Service survey, and Northern Ireland's 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 345. In April 2009, however, Belfast News reported an article from Belfast Telegraph in December 2008, where AVX announced it was making 92 redundancies and in Carrick Ryobi, which also Manufactures parts for the motor industry, confirmed plans to axe around 100 posts. In that article, the Belfast Telegraph estimated the workforce at the company consisting of 390 people. 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 Northern Ireland fair employment law and Code of Practice: AVX's equal opportunities policy appears to conform with Northern Ireland's fair employment law. It calls for periodic review of selection procedures, staff development, publicizing the policy and filing



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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.

While the Northern Ireland senior management is responsible for overseeing the company's equality policy in the country, 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 said. 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.

Hiring procedures appear to be systematic, with interview panels, sometimes representation from both communities and EEO training for staff involved in the process. Job advertisements, which include an EEO statement, are placed in the Belfast Telegraph as well as local and regional newspapers and local job markets. AVX also tracks applicant success rates by religion to identify differential success rates. 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."

Compliance with Northern Ireland fair employment law and Code of Practice: AVX's equal opportunities policy appears to conform with 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. Hiring procedures appear to be systematic, with interview panels, representation from both communities and EEO training for staff involved in the process. Job advertisements, which include an EEO statement, are placed in the Belfast Telegraph as well as local and regional newspapers and local job markets. AVX also tracks applicant success rates by religion to identify differential success rates. 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



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

Underrepresentation analysis: As of 2010, Catholics appear to be slightly underrepresented at the company overall (23 percent). Catholic representation at AVX has fallen from a high of 28 percent in 2001 to the present level. In previous responses to MSCI survey, the company estimated 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 no new workers in the 2009 monitoring period, and category per category breakdown is not available as of December 2010.

In the company response to MSCI's 2009 survey, Catholics were also underrepresented throughout all categories: 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.

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, which was no longer visible on the most recent site visit in 2006.

Conformance with MacBride principles: The company has had an agreement to implement the MacBride principles since 1998. 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. In addition, in the 2009 survey, the company reminded that it is "compliant in so far as it is practical to do so, while adhering to the legal requirements of the Northern Ireland legislation."

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 need to reassess this view. 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.



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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; the paint was gone on the most recent site 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 were all conciliated in 2005. AVX said the complainant alleged discrimination after he was provisionally selected for redundancy. The company declares it has no outstanding claims, and this consistent with the Fair Employment Register as of August 2009.

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



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Aon Corporation

Operations in Northern Ireland:

Aon McMillen

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented			

Catholics	Yes
Underrepresented	

Agreement Date	12/1/1991	Affirmative Action	No	FET Settlements	0
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• **Aon McMillen**

Location Belfast

Business Insurance broking/investment

Employees (Data as of 2010)

Protestant

Catholic

Other

Total	45
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2010 Survey Response: None

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 four 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 Northern Ireland 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



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Northern Ireland are responsible for fair employment matters (the proportion is however seven Protestants per one Catholic in this SOC).

Underrepresentation analysis: AON, an insurance brokerage and financial investment advisory firm, did not provide an exact breakdown of its workforce to the Equality Commission in 2010. However, the monitoring report noted that at most 20 percent of the company's 45 employees were Catholics, being so underrepresented with respect to Belfast (33 percent Catholic) or all of Northern Ireland (42.8 percent Catholic).

Given the company's historical Catholic underrepresentation, and Aon-reported high staff retention rate (which prevents it from changing the composition of its work force), Catholics appear to be still underrepresented.

In 2009 survey response, Catholics appeared to be severely underrepresented in Aon's overall work force and in the two higher level employment categories at the company. The weighted catchment area is 34.8 percent Catholic, but the Catholic share of the work force has even decreased from 7 percent in 2008 to 2.9 percent in 2009. In 2009 the company also registered three redundancies, two Protestants and one non affiliated.

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



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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.



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Art Technology Group, Inc.*Operations in Northern Ireland:**ATG (Northern Ireland) Limited*

MacBride Agreement	Yes	Protestants Underrepresented	Yes	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	Unknown	FET Settlements	0
Location	Belfast				
Business	Software development				
Employees	(Data as of 2010)				
	Protestant	20			
	Catholic	25			
	Other	5			
	Total	50			

2010 Survey Response: None

Available information: Art Technology Group acquired Primus Knowledge Solutions, the former parent of the Belfast-based Amacis company, in November 2004. Primus bought Amacis and its electronic commerce management solutions business in December 2003. Subsequent to the most recent acquisition, the subsidiary Amacis underwent a name change to Art Technology Group. The company's annual report in form 10-K as of February 2010 listed its Northern Ireland subsidiary under the name of ATG (Northern Ireland) Limited.

Neither parent company has responded to requests from the Northern Ireland Service.

Compliance with Northern Ireland fair employment law and Code of Practice: No information is available on the company policies because it has not responded to the Northern Ireland Service survey and policies are not available on the company website. The employees in Belfast report to managers in Cambridge, Massachusetts (U.S.).

Underrepresentation analysis: According to the Equality Commission's 2010 Monitoring Report, Protestants composed 44.4 percent of ATG's affiliated employees, while Catholics represented the remaining 55.6 percent, in a workforce of 50 employees. The Protestants appeared to be



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underrepresented in ATG relative to the group's distribution in Belfast (67 percent) and the whole of Northern Ireland (57.3 percent).

As of 2009, ATG (Northern Ireland) reported in the Equality Commission's 2008 Monitoring Report to have one office in Belfast downtown, where it employed 29 workers: 13 Protestants (48.1 percent), 14 Catholics (51.9 percent), and two non-affiliated.

Conformance with MacBride principles: The company has not responded to request from the Northern Ireland Service and has not taken a stance on MacBride compliance.

Affirmative action outreach: No affirmative action appear warranted.

Chill factor and neutral workplace: The company is in a mixed community in south Belfast, and members from both communities should be comfortable at the location.

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



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Baker Hughes Incorporated

Operations in Northern Ireland:
Hughes Christensen

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented			

		Catholics	Yes		
		Underrepresented			
Agreement Date	2/1/2007	Affirmative Action	Yes	FET Settlements	0

- Hughes Christensen**

Location	Belfast
Business	Oil drilling equipment (rock bits)
Employees	(Data as of 2010)
	Protestant 309
	Catholic 44
	Other 11
	<hr/> Total 364

2010 Survey Response: None

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 308 in 2008. The business Telegraph reported on Sep. 15, 2009, that nearly 100 jobs are expected to go at Hughes Christensen's East Belfast engineering facility, due to a fall in oil and gas exploration hitting demand for the drill bits it makes. The company, has already axed 135 jobs since the start of the year and is moving part of its Belfast production to Texas. However, as of 2010, the company employs 364 workers in Northern Ireland.

Compliance with Northern Ireland 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.



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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: According to the 2009 Equality Commission Monitoring Report, Protestants composed 87.5 percent of Hughes Christensen's affiliated employees, while Catholics represented the remaining 12.5 percent. Catholics appear to be underrepresented when compared to the Belfast catchment area (33 percent Catholic). A different trend is instead registered among new hires, among which Catholics are only slightly underrepresented: in the most recent monitoring period, 17 of the company's 71 new hires (26.2 percent) have been Protestants.

Over past years, expansions and new investment at times have had virtually no effect on Catholic representation. 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 positions 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 the current 12.5 percent.

Conformance with MacBride principles: Hughes Christensen agreed to implement the MacBride principles in February 2007 after New York City pension funds agreed to withdraw a resolution in return. The shareholder advocates had been asking the company to adopt the principles since 1988.

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



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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. 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, but fell short in 2007, when 20 percent of new hires were Catholic. 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.



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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.



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Bemis Company, Inc.

Operations in Northern Ireland:

Perfecseal Ltd.

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date	11/1/1997	Affirmative Action	Yes	FET Settlements	0

• Perfecseal Ltd.

Location	Londonderry	
Business	Medical packaging	
Employees	(Data as of 2010)	
	Protestant	10
	Catholic	26
	Other	6
	Total	42

2010 Survey Response: None

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 until recently, whereas it has not responded to the 2009 survey. 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 2008 it reported the largest staff to date of 248 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 moved to a new location in 2007 because it had 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. Before the move, company representatives told the Northern Ireland Service that it expected 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,"



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Perfecseal held employee discussion forums and talks with Amicus, the trade union that represents the majority of the staff.

Compliance with Northern Ireland 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: According to the Equality Commission's 2009 Monitoring Report, Protestants composed 27.8 percent of Perfecseal while Catholics represented the remaining 72.2 percent. As of December 2010, neither community appeared to be underrepresented when compared to the 2001 census data for Londonderry, the area where the company operates, the most appropriate catchment area given the company's business.

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



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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: Five grievances were filed against the company at the Fair Employment Tribunal in 2006 and conciliated in 2007. 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.



Conexant Systems, Inc.

Operations in Northern Ireland:

Amphion Semiconductor

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

• **Amphion Semiconductor**

Location	Belfast
Business	Design and supply of digital signal processing
Employees	(Data as of 2010)
	Protestant
	Catholic
	Other
	<hr/>
	Total
	NA

2010 Survey Response: None

Available information: Amphion Semiconductor, acquired by Conexant Systems in 2004, registered with the Equality Commission in 1998.

Compliance with Northern Ireland fair employment law and Code of Practice:

Underrepresentation analysis: As of December 2010, no information is available regarding the company's workforce in Northern Ireland. Amphion results in having still an office and a contact person in Northern Ireland, but it is not listed in the Register of Employers or in the Monitoring Report from the Equality Commission for Northern Ireland, which may mean its workforce has dropped down to fewer than 10 employees.

In 2008, fewer than 10 of Amphion Semiconductor's 27 employees were Roman Catholic. The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.



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Conformance with MacBride principles: Conexant has not yet replied to the Northern Ireland Service's inquiries regarding its compliance with the MacBride principles.



Danaher Corporation

Operations in Northern Ireland:

Qualitrol Hathaway Instruments

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented			

Catholics	No
Underrepresented	

Agreement Date	2/1/2003	Affirmative Action	No	FET Settlements	0
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- Qualitrol Hathaway Instruments**

Location	Belfast
Business	power utility monitoring equipment
Employees	(Data as of 2010)
	Protestant 44
	Catholic 47
	Other 11
	Total 102

2010 Survey Response: None

Available information: Danaher acquired the power and process segment of Hathaway Corp., which owned Hathaway Systems in Northern Ireland, in 2002. Employment at the company has fluctuated over the years between 51 in 2004 and 70 in 2000, rising to 77 in 2008.

Compliance with Northern Ireland 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



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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: According to the Equality Commission's 2009 Monitoring Report, Protestants composed 48.4 percent of electronics manufacturer Qualitrol's affiliated employees while Catholics represented the remaining 51.6 percent. Given the nature of Qualitron's business, the most appropriate catchment area to be used for underrepresentation assessment is the whole of Northern Ireland (57.3 percent Protestant and 42.7 percent Catholic. Though Protestants appear to be slightly underrepresented, this does not appear to be significant. As such, both communities appeared to be fairly represented.

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.



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E. I. du Pont de Nemours and Company

Operations in Northern Ireland:

DuPont UK Ltd.

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented			
		Catholics	No		
		Underrepresented			
Agreement Date	3/1/1992	Affirmative Action	No	FET Settlements	0
• DuPont UK Ltd.					
Location	Londonderry				
Business	Kevlar				
Employees	(Data as of 2010)				
	Protestant	62			
	Catholic	115			
	Other	1			
	Total	178			

2010 Survey Response: None

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. Company representatives 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 Northern Ireland 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 and are also



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advertised internally. 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.

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

Underrepresentation analysis: As of December 2010, no group appeared to be underrepresented at Du Pont when the work force was 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. This figure did not differ significantly with the percentage of the company's Catholic employees which was about 65 percent according to the Equality Commission's 2009 Monitoring Report.

DuPont does not recognize sectarian holidays, including St. Patrick's Day and the July 12 Drumcree parades.

Conformance with MacBride principles: DuPont reached an accord with shareholder proponents of the MacBride principles in 1992 and has cooperated with the monitoring process by the Northern Ireland Service. 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 Drumcree 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.



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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.



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Emerson Electric Co.*Operations in Northern Ireland:**Copeland Ltd.*

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

• **Copeland Ltd.**

Location	Cookstown, Co. Tyrone
Business	Scroll compressors
Employees	(Data as of 2010)
	Protestant 79
	Catholic 125
	Other 34
	<u>Total 238</u>

2010 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. The company eliminated 55 positions in the 2008 monitoring period.

Compliance with Northern Ireland 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



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procedure for complainants. Copeland has not set up a consultation process with worker representatives on equal employment issues.

Underrepresentation analysis: According to the Equality Commission's 2009 Monitoring Report, Protestants composed 38.7 percent of compressor assembler Copeland's affiliated employees, while Catholics represented the remaining 61.3 percent. Neither community appeared to be underrepresented when compared to the 2001 census data of Cookstown (45 percent Protestant and 55 percent Catholic), the area where the company operates.

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."

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.



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General Electric Company

Operations in Northern Ireland:

GE Capital Woodchester (Northern Ireland)

GE Medical Systems

Hurst (Charles) Ltd

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented			

Catholics	Yes
Underrepresented	

Agreement Date	9/1/1998	Affirmative Action	Yes	FET Settlements	0
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• **GE Capital Woodchester (Northern Ireland)**

Location	Belfast
Business	Auto leasing
Employees	(Data as of 2010)
	Protestant
	Catholic
	Other
Total	5

2010 Survey Response: None

Available information: GE told MSCI in 2004 that 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 stood at 5 as of 2004. Given its small size, the company did not report data on the religious composition of its work force.



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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.

Compliance with Northern Ireland fair employment law and Code of Practice:

Underrepresentation analysis: GE Capital did not appear in the Equality Commission's Registry of Employers published in September 2010, meaning that the company had 10 employees or less. In 2004, the company told MSCI's Northern Ireland Service that it had 5 employees. MSCI's Northern Ireland Service refrains from drawing conclusions on community representation when the workforce consists of fewer than 30 employees.

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

• GE Medical Systems

Location	Belfast
Business	sales/service of medical equipment
Employees	(Data as of 2010)
	Protestant
	Catholic
	Other
	<hr/> Total

2010 Survey Response: None

Available information: GE Medical Systems has a small operation in Belfast. Employment at the company grew from only three in 1998 to 15 in 2006, the last year for which data are available. Since then, the company appeared always in the Register of Employers (meaning that it employs 11 or more workers) but not in the Monitoring Report (meaning that it employs 25 or fewer). Workers at the service office maintain the company's medical diagnostic imaging equipment used in hospitals



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and clinics in Northern Ireland. In 2006, GE provided a copy of the company's 2006 monitoring report that it submitted to the Equality Commission.

Compliance with Northern Ireland 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: As of December 2010, GE Medical Systems appeared to only have 10 to 25 employees, as it appeared in the Equality Commission's 2010 Registry of Employers but not in the 2009 Monitoring Report. MSCI's 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."

- **Hurst (Charles)**

Location	Belfast and seven other towns	
Business	Vehicle sales, service	
Employees	(Data as of 2010)	
	Protestant	559
	Catholic	216
	Other	66
	Total	841

2010 Survey Response: None



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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.

However, it did not submit responses since 2007. The company's work force has expanded substantially in the last few years, growing to the present level of 994 full-time workers from only 566 in 1997. According to the 2009 Monitoring Report, the company has currently reduced its workforce down to 199 employees.

Hurst has several locations including car dealerships, tire repair stores and/or repair shops in Bangor, Belfast, Coleraine, Lisburn, Londonderry, Newtownabbey, Newtownards, Omagh and Portadown.

Compliance with Northern Ireland 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: According to the Equality Commission's 2009 Monitoring Report, about 92 percent of Charles Hurst's 841 employees have identified religious affiliations. Of this, 72.1 percent were Protestants and 27.9 were Catholics. The report also noted that the company hired 94 new employees, of which 83 have identified religious affiliations. Among the new hires with religious affiliations, 54.2 percent were Protestants while 45.8 percent were Catholics. The statistics for the new hires appear to be fairly representative when compared to the Northern Ireland catchment area (57.3 percent Protestants and 42.7 Catholics). However, Catholics still appeared to be underrepresented when data regarding the current workforce is also taken into account.



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Charles Hurst has argued that the imbalance in its work force stemmed 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 succeeded in meeting the first goal, but not the latter.

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 offense. 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 claim filed in 2006 claiming religious discrimination is pending as of December 2009.



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Goodrich Corporation

Operations in Northern Ireland:

Goodrich Control Systems

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented	No		
		Catholics			
		Underrepresented			
Agreement Date	12/1/2002	Affirmative Action	No	FET Settlements	0

• Goodrich Control Systems

Location	Belfast
Business	Aero Engine Controls
Employees	(Data as of 2010)
	Protestant 18
	Catholic 12
	Other 3
	Total 33

2010 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. The company's work force composition has not changed during the most recent monitoring period.

Compliance with Northern Ireland 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



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by religious community to determine success rates. Further more, the company said in its 2010 survey response that any decisions on increasing/decreasing the workforce in Belfast are taken in conjunction with its HR department based at the headquarters in Birmingham, England.

Underrepresentation analysis: In its 2010 survey response, the company disclosed to employ 18 Protestants (60 percent), 12 Catholics (40 Percent), and three non affiliated. In the same monitoring period, the company received five Catholic applicants and two Protestants, and it hired two Catholics. Since most of the company employees are professional occupations, all of Northern Ireland is deemed the best catchment area. The company workforce reflects the community breakdown in the Province (57.3 percent Protestant, 42.7 percent Catholic).

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.

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.



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Hewlett-Packard Company

Operations in Northern Ireland:

Hewlett-Packard

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented			
		Catholics	No		
		Underrepresented			
Agreement Date	12/1/1998	Affirmative Action	No	FET Settlements	0

• Hewlett-Packard

Location Belfast

Business Computer sales, consultancy and service

Employees (Data as of 2010)

Protestant	15
Catholic	11
Other	16
Total	42

2010 Survey Response: None

Available information: Hewlett-Packard has told MSCI it would not respond the 2010 annual Northern Ireland survey. 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, in 2009 stands at 49 workers, down from 62 in the previous monitoring period. 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 Northern Ireland 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



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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 UK as well as corporate headquarters are responsible for the company's equality policy.

Underrepresentation analysis: Both groups appear to be fairly represented according to the most recent Equality Commission's data (57.6 percent Protestant and 42.3 percent), when considering the employees with identified religious affiliation (62 percent of the company's total workforce). However, the large proportion of workers identified as not belonging to either community (16 employees corresponding to 38 percent of the company's workforce) could be a sign of poor monitoring by the company, and lead to a sentiment of underrepresentation by employees of both groups.

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 believe 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.



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Hyatt Hotels Corporation

Operations in Northern Ireland:

SMG (Northern Ireland) Ltd

MacBride Agreement Yes Protestants No FET Discrimination Findings 0
Underrepresented

Catholics No
Underrepresented

Agreement Date Affirmative Action No FET Settlements 0

• SMG (Northern Ireland) Ltd

Location Belfast

Business

Employees (Data as of 2010)

Protestant 46

Catholic 28

Other 19

Total 93

2010 Survey Response: None

Available information: Available information: SMG Sheridan manages the Odyssey Arena, a Landmark Millennium Project for Northern Ireland. The Arena houses a cinema, a concert venue, the W5 discovery centre, the pavilion which offers bars and nightclubs and a space car park.

SMG Sheridan manages the Odyssey Arena, a Landmark Millennium Project for Northern Ireland. The Arena houses a cinema, a concert venue, the W5 discovery centre, the pavilion which offers bars and nightclubs and a space car park.

SMG is a joint venture with Hyatt Hotels and Aramark, a hospitality and facility management company based in Pennsylvania. Aramark responded to the Northern Ireland Service from 2002 through 2005, but has not responded since.

Compliance with Northern Ireland fair employment law and Code of Practice: The company says it adheres to all fair employment standards established by Northern Ireland law, and that its first triennial policy review was completed in January 2004. The company says it follows "best practice procedures as recommended by the Equality Commission and Northern Ireland HR consultants."



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The company recruits employees through public advertisements in the Belfast Telegraph, government job markets and the Internet. It always includes an EEO statement in its employment ads. SMG always uses a panel when interviewing job candidates, and sometimes ensures that both communities are represented. It says that all those involved in candidate selection receive training on equal employment issues, and that the company monitors the religious composition of the applicant pool and new hires to determine success rates by community. The company notes that all employees receive harassment training using materials from the Equality Commission. Senior managers at the company's operations in Northern Ireland are responsible for implementing SMG's EEO policy. Employees at the company have no union representation.

Underrepresentation analysis: According to the 2009 Equality Commission's Monitoring Report, the company employs 93 workers: 46 Protestants (corresponding to 62.1 percent of the Protestant-to-Catholic rate), 28 Catholics (37.8 percent), and 19 non-affiliated, showing fair representation of both communities, being the facility located in Belfast.

Conformance with MacBride principles: Since this facility is a joint venture between two private companies, it has never received a shareholder resolution on the MacBride principles, which is the usual route to an agreement. The company reported its policies reflect the fair employment standards embodied in the MacBride principles of fair employment and it agreed to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach: No affirmative action measures appear warranted.

Grievances: The company reported that no complaints have been filed against it at the Fair Employment Tribunal and the most recent records from the FET register.



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International Business Machines Corporation

Operations in Northern Ireland:

IBM United Kingdom

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

• **IBM United Kingdom**

Location	Belfast
Business	computer sales and service
Employees	(Data as of 2010)
	Protestant 20
	Catholic 12
	Other 3
	<u>Total 35</u>

2010 Survey Response: None

Available information: IBM responded in full to the Northern Ireland Service fair employment survey in 2008 for the first time since 2005.

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

Underrepresentation analysis: According to the 2009 Equality Commission's Monitoring Report, the company has 20 Protestant employees (62.5 percent Protestant-to-Catholic rate) and 12 Catholic employees (37.5 percent). Both communities appears to be presented fairly in both the Belfast travel to work area and the whole of Northern Ireland catchment area.

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 identity to anyone but the Speak Up coordinator.



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Jacobs Engineering Group Inc.

Operations in Northern Ireland:

Jacobs UK Limited

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

• Jacobs UK Limited

Location	Belfast
Business	Civil consulting
Employees	(Data as of 2010)
	Protestant 20
	Catholic 22
	Other 4
	Total 46

2010 Survey Response: None

Available information: Jacobs Engineering Group Inc. offers consulting services to industrial, commercial and government clients worldwide. The company's subsidiary, Jacobs UK, began operating in Northern Ireland in the late 1990s. It won a contract from the Northern Ireland Department for Regional Development Water Service in May 2006. The company will support a USD380 million annual capital investment program. The Northern Ireland Service surveyed the company for the first time in 2006 and it responded in full, but the company did not respond in 2007 or 2008. The company did not appear in the Equality Commission's 2007 Monitoring Report, indicating that it had 25 or fewer employees during that monitoring period. However, it was included again in the 2009 monitoring report, issued in December 2009, with a total monitored workforce of 42 employees.

Compliance with Northern Ireland fair employment law and Code of Practice: The company reports that its policies adhere to the Code of Practice. Jacobs UK Ltd. notifies all employees when positions become available to internal applicants. Advertisements are published in a variety of sources, including the Belfast Telegraph, other local newspapers, job markets, trade publications



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and the company intranet. The company does not always use an interview panel when selecting candidates, but all employees involved in candidate selection are trained on equal opportunity employment issues. Management occasionally consults with trade unions on equality policy issues. Corporate headquarters and UK management oversee the company's equality policy. All managers receive training on sectarianism and intimidation issues.

Underrepresentation analysis: The company workforce has increased notably in the last two years, from fewer than 25 to 46, as reported in the 2009 Equality Commission's Monitoring Report issued in December 2010. Here, the company has monitored 46 employees: 20 are Protestants (47.6 percent of the Protestant-to-Catholic rate), 22 Catholics (52.3 percent), and four non-affiliated. Protestants appeared to be underrepresented within the Belfast travel-to-work-area, where the religious background is 67 percent Protestant.

However, when assessing underrepresentation at one company, the Northern Ireland Service always considers the company business type and the consequent catchment area reflects the ability that the company has to attract workforce throughout Northern Ireland. Jacobs UK Ltd. supplies highly-specific services, which are likely to attract people from all Northern Ireland, which is therefore to be considered as the most appropriate catchment area. Here, the religious background is 57.3 Protestant and 42.7 Catholic, and therefore both communities appear to be fairly represented at the company's facility in Belfast.

Conformance with MacBride principles: In its 2006 survey response, Jacob Engineering agreed to comply with monitoring by the Northern Ireland Service and reported that its policies adhere to the MacBride principles. Jacobs UK reported that senior management review local managers to ensure the standards embodied in the MacBride principles are maintained.

Affirmative action outreach: No affirmative action measures are warranted.

Chill factor and neutral workplace: The company is in neutral downtown Belfast and its location should not be intimidating to either community. Jacobs UK reported that it provides, "a neutral workplace in a neutral location, which was selected from both a religious perspective and staff safety to/from work."

Grievances: No complaints have been filed against the company at the Fair Employment Tribunal. Employees can raise complaints confidentially or speak with someone other than their direct supervisor.



Manpower Inc.

Operations in Northern Ireland:

Manpower UK (Ltd)

Right Management

MacBride Agreement No Protestants Yes FET Discrimination Findings 0
Underrepresented

Catholics No
Underrepresented
Agreement Date Affirmative Action No FET Settlements 0

• Manpower UK (Ltd)

Location Belfast
Business Recruitment staffing solutions
Employees (Data as of 2010)
Protestant 270
Catholic 225
Other 36
Total 531

2010 Survey Response: None

Available information: Manpower is a worldwide employment services company; its presence in Northern Ireland has expanded substantially from the early part of the decade, with a jump from only 62 employees in 2001 to 935 in 2003. Its work force has since shrunk significantly, to 821 workers in 2006 and 467 in 2007, but has increased again as of 2010, up to 531 employees. The company has not responded to the Northern Ireland Service survey for several years, and management has opposed shareholder resolutions asking the company to adopt the MacBride principles.

Compliance with Northern Ireland fair employment law and Code of Practice: No information is available about the company's fair employment policies or practices.



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Underrepresentation analysis: According to the 2009 Equality Commission's Monitoring Report, Catholic representation decreased by 14.5 percent, now corresponding to 45.5 percent of the Protestant-to-Catholic rate, whereas Protestants increased province-wise to 54.5 percent. While Protestants are still underrepresented with respect to the 67 percent Protestant representation of the Belfast travel-to-work area, community representation is fair with respect to all of Northern Ireland (57.3 percent Protestant). Given the company's business, that it is likely to attract employees from all the province, all of Northern Ireland is deemed the most appropriate catchment area. Consequently, both communities appear fairly represented at Manpower's operations in Northern Ireland.

The Equality Commission says Manpower has very high level of turnover and that its entire staff may change on a yearly basis. This is partially confirmed by the Monitoring Report's data on hirings: as of 2010, the company hired 520 new employees in one monitoring report, whereof 53.9 percent Protestants.

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

Affirmative action outreach: The company did not provide any information about any affirmative action efforts; outreach appears warranted given the apparent underrepresentation of Protestants and the significant increase in their representation.

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

Grievances: A complaint was filed against the company in April 2005 and was conciliated in 2006.

- **Right Management**

Location	Belfast
Business	Management consulting
Employees	(Data as of 2010) Protestant



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Catholic	
Other	
Total	5

2010 Survey Response: None

Available information: Right Management has a small office in Belfast at Clarendon Docks, a neutral location close to downtown, that employs fewer than 11 workers. Manpower Inc. lists the office on its Web site but it is not registered with the Equality Commission and has not appeared in any of the commission's reports on fair employment. The company has not responded to the Northern Ireland Service annual survey.

Underrepresentation analysis: MSCI's Northern Ireland Service refrains from drawing conclusions on community representation when the workforce consists of fewer than 30 employees.

Conformance with MacBride principles: A shareholder resolution asking Manpower Inc. to adopt the MacBride principles for Right Management and its much larger Manpower PLC subsidiary got 13.2 percent support in 2008. The company said, "In effect, Manpower's policies and applicable laws endorse the same believe in equality of opportunity that is embodied in the MacBride principles." But, like other companies that have opposed MacBride resolutions, it argued that adopting the principles would make it "unnecessarily accountable to different sets of overlapping fair employment guidelines."

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



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Marsh & McLennan Companies, Inc.

Operations in Northern Ireland:

Marsh (UK), Ulster Insurance Services, Marsh Financial

Mercer Human Resources Consulting

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	0
		Underrepresented	No		
		Catholics			
		Underrepresented			
Agreement Date		Affirmative Action	No	FET Settlements	0
<ul style="list-style-type: none"> Marsh (UK), Ulster Insurance Services, Marsh Finan 					
Location	Belfast and Strabane				
Business	Insurance services				
Employees	(Data as of 2010)				
	Protestant				
	Catholic				
	Other				
	Total	37			

2010 Survey Response: None

Available information: Marsh & McLennan last responded to the Northern Ireland Service survey in 2003. In 2004, management at Marsh & McLennan explained that there was little time to deal with anything but a lawsuit filed by New York attorney general Eliot Spitzer. It provided no response in 2009.

Compliance with Northern Ireland 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



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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: Until 2008, neither community appears to be underrepresented in the overall work force, nor was there underrepresentation in any individual job categories at the time, when compared to a catchment area that includes all of Northern Ireland. However, data from the Equality Commission 2009 monitoring report shows how, while employment has dropped to 37 individuals (from 44 two years before), Catholics are now fewer than ten. In the case in which Catholics accounted for nine employees, the community would be represented up to 24 percent. As a consequence, Catholics appear to be underrepresented when considering the whole Northern Ireland as catchment area (where the Catholic presence is at 42.7 percent). However, the company has two offices: one in Belfast (67 percent Protestant) and one in Strabane (64.6 percent Catholic, but surrounded by Protestant neighborhood). It is reasonable to conclude that the company reflects the county's community breakdown at its local offices in these two locations, with a Belfast office likely preponderant in terms of workforce. However, the company does not disclose workforce breakdown. Moreover, it is likely to attract employees from whole Northern Ireland. Eventually, given the location of the Strabane office, the company is maintained as underrepresenting Catholic community.

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 were no longer appear warranted as Catholics seemed 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.



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• Mercer Human Resources Consulting

Location	Belfast	
Business	Pensions consultancy/administration	
Employees	(Data as of 2010)	
	Protestant	32
	Catholic	20
	Other	14
	Total	66

2010 Survey Response: None

Available information: Mercer Human Resources last responded to the Northern Ireland Service survey in 2003. In 2004, management at Marsh & McLennan explained that there was little time to deal with anything but a lawsuit filed by New York attorney general Eliot Spitzer. The company did not respond to the 2009 survey.

Compliance with Northern Ireland 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: According to the 2009 Equality Commission's Monitoring Report, 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 61.5 percent Protestant to 38.4 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. In 2009, although the company workforce fell from 88 to 66 employees, community representation figures remained steady, with the non-affiliated unfavored by the reduction of personnel.

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.



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Affirmative action outreach: No affirmative action measures appear warranted.

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

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



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McDonalds Corporation

Operations in Northern Ireland:

McDonald's Restaurants

North West Restaurants Ltd.

Cobain Mark t/a McDonald's Glengormley

Connan Paul Ltd.

Dunluce Restaurants t/a McDonalds

Hewitt Geoff t/a McDonald's Ballymena

JMC Restaurants t/a McDonald's Sprucefield

McDermott Paul t/a McDonald's Connswater

Rahon Enterprises t/a McDonald's

S & S Restaurants t/a McDonald's Restaurant

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

• McDonald's Restaurants

Location	24 locations province-wide
Business	fast food
Employees	(Data as of 2010)



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Protestant	29
Catholic	150
Other	6
Total	185

2010 Survey Response: None

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 regularly completed the Northern Ireland Service survey, describing its fair employment policies and providing overall employment information for its franchise operations.

Compliance with Northern Ireland 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 UK diversity



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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: According to the Equality Commission's 2009 Monitoring Report, there has been a significant reduction of employees. McDonald's Restaurant has a total of 185 employees: 29 Protestant employees (16.2 percent Protestant to Catholic rate) 150 Catholic employees (83.7 percent). 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.

From previous survey responses, Catholics account for about 50 percent of the work force at the franchise operations, far exceeding the ideal estimate of between 42 and 46 percent. The company provided specific data in 2005, when 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.

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. 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



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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 in previous responses 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 restaurants managers and senior staff above that level. The company's diversity policy specifically forbids sectarian harassment of staff, and all employees have received workshops or training on sectarian harassment and intimidation using materials from the Equality Commission and other sources.

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



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• North West Restaurants Ltd.

Location	3 in Londonderry
Business	fast food
Employees	(Data as of 2010)
	Protestant 0
	Catholic 0
	Other 0
	<hr/> Total 0

2010 Survey Response: None

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

Underrepresentation analysis: North West Restaurants is not present in the Register of Employees as of September 2010, and its workforce consists then of fewer than 11 employees. MSCI's Northern Ireland Service refrains from drawing conclusions on community representation when the workforce consists of fewer than 30 employees.

Grievances: No complaints have been filed against the company since 2003.

• Cobain Mark t/a McDonald's Glengormley

Location	Belfast
Business	Fast food
Employees	(Data as of 2010)
	Protestant 0
	Catholic 0
	Other 0
	<hr/> Total 45

2010 Survey Response: None

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

Underrepresentation analysis: Neither community seems to be underrepresented. Catholics account for less than ten out of 45 employees. In the case there were nine Catholic employees, the community would be represented at 20 percent of the company's workforce. This is consistent with



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the 21.3-percent Catholic presence in Newtownabbey, deemed the most appropriate catchment area given the company's business.

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

- **Connan Paul Ltd.**

Location	Dundonald and Belfast
Business	fast food
Employees	(Data as of 2010)
	Protestant 59
	Catholic 173
	Other 54
	<hr/> Total 286

2010 Survey Response: None

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

Underrepresentation analysis: According to data from the 2009 Monitoring Report, Protestants (25.4 percent) appear to be underrepresented at the company, while compared to the Belfast area (67 percent Protestant), the most appropriate given the company business). Hirings for the monitoring period confirm this trend: 56 of the 86 new hirings were Catholic (82.4 percent), and 12 Protestant (17.6 percent).

Affirmative action outreach: Affirmative actions do not appear warranted, as there is no turnaround in Protestant underrepresentation in the workforce or hirings.

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

- **Dunluce Restaurants t/a McDonalds**

Location	Coleraine
Business	fast food
Employees	(Data as of 2010)
	Protestant 41
	Catholic 21
	Other 10



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Total 72

2010 Survey Response: None

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

Underrepresentation analysis: According to the Equality Commission's 2009 Monitoring Report, the company has 72 employees: 41 Protestant employees (66.1 percent Protestant-Catholic rate) and 21 Catholic employees (33.8 percent). Compared to the catchment area in Coleraine (Protestant 71.9 percent, Catholic 28.1 percent), both communities are fairly represented.

Grievances: One grievance was filed against the company and several managers in March 2004. Dunluce Restaurants settled the claim in 2006.



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

Location	Ballymena
Business	fast food
Employees	(Data as of 2010)
	Protestant 0
	Catholic 0
	Other 0
	<hr/> Total 0

2010 Survey Response: None

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

Underrepresentation analysis: Hewitt Geoff is not present in the Register of Employees as of September 2010, and its workforce consists then of fewer than 11 employees. MSCI's Northern Ireland Service refrains from drawing conclusions on community representation when the workforce consists of fewer than 30 employees.

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

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

Location	Lisburn
Business	fast food
Employees	(Data as of 2010)
	Protestant 34
	Catholic 33
	Other 5
	<hr/> Total 72

2010 Survey Response: None

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

Underrepresentation analysis: According to the Equality Commission's 2009 Monitoring Report, the company has 72 employees: 34 Protestant employees (50.7 percent of the Protestant-to-Catholic rate) and 33 Catholic employees (49.2 percent). Compared to the catchment area in



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Lisburn (Protestant 68.5 percent, Catholic 31.5), the most appropriate given the company's business, the Protestant community is underrepresented.

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

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

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

Location	Belfast
Business	fast food
Employees	(Data as of 2010)
	Protestant 0
	Catholic 0
	Other 0
	<hr/> Total 0

2010 Survey Response: None

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

Underrepresentation analysis: Please refer to the profile for McDonald's Restaurants

McDermott Paul is not present in the Register of Employees as of September 2010, and its workforce consists then of fewer than 11 employees. MSCI's Northern Ireland Service refrains from drawing conclusions on community representation when the workforce consists of fewer than 30 employees.

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

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

Location	Bangor
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Business	fast food	
Employees	(Data as of 2010)	
	Protestant	237
	Catholic	211
	Other	25
	Total	473

2010 Survey Response: None

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

Underrepresentation analysis: According to the Equality Commission's 2009 Monitoring Report, the company has 473 employees: 237 Protestant employees (52.9 percent Protestant-Catholic rate) and 211 Catholic employees (47 percent). Compared to the catchment area in Bangor, North Down (Protestant 85.3 percent), the the Protestant community is highly underrepresented. The report also disclosed that out of 291 newly-hired employees, 132 new hires composed the Protestant community, whereas 134 new hires composed the Catholic workforce.

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

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

Location	Newry, county Down	
Business	fast food	
Employees	(Data as of 2010)	
	Protestant	0
	Catholic	0
	Other	0
	Total	72

2010 Survey Response: Partial

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

Underrepresentation analysis: According to data from the 2009 Monitoring Report, S & S Restaurants employ less than ten Protestants. In the case these were nine individuals, Protestants would account for 13.8 percent at the company. The community appears then to be underrepresented when compared with the county Down catchment area (38.2 percent Protestant), deemed the most appropriate given the company's business.



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



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Merck & Co., Inc.

Operations in Northern Ireland:

Merck Sharp & Dohme

MacBride Agreement	Yes	Protestants	Unknown	FET Discrimination Findings	0
		Underrepresented	Unknown		

		Catholics			
		Underrepresented			
Agreement Date	9/1/2002	Affirmative Action	Unknown	FET Settlements	0

• Merck Sharp & Dohme

Location	Sales people work from home
Business	Sales
Employees	(Data as of 2010)
	Protestant
	Catholic
	Other
	Total
	NA

2010 Survey Response: None

Available information: Merck has for years maintained a small pharmaceutical sales force in Northern Ireland, which in 2004 grew to 16 workers. The company hired an additional employee in 2006. The company appears in the Register of Employers, meaning that it has from 11 to 26 employees. The company has not responded to the Northern Ireland Service survey in 2009, although it had in the past, describing its policies and work force breakdown for the last several years.

Compliance with Northern Ireland 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



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"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: Merck has for years maintained a small pharmaceutical sales force in Northern Ireland. It appears in the Register of Employers, meaning that it has from 11 to 26 employees. The company has not responded to the Northern Ireland Service survey since 2009, although it had in the past, describing its policies and work force breakdown for the last several years.

MSCI's Northern Ireland Service does not statistically assess companies with fewer than 30 employees. However, the employee breakdown at Merck available from previous responses is reflective of the community breakdown in Northern Ireland.

Conformance with MacBride principles: Merck says 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 measures appear warranted.

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

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



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Microsoft Corporation

Operations in Northern Ireland:

Microsoft

MacBride Agreement	Yes	Protestants Underrepresented	Unknown	FET Discrimination Findings	0
		Catholics Underrepresented	Unknown		
Agreement Date	12/1/2006	Affirmative Action	Unknown	FET Settlements	0
• Microsoft					
Location	Belfast				
Business	Software				
Employees	(Data as of 2010)				
	Protestant				
	Catholic				
	Other				
	Total	NA			

2010 Survey Response: None

Available information: Microsoft provided the Northern Ireland Service with a copy of its fair employment monitoring return in 2005 and has completed the survey in each of the past three years. The company opened new premises in Belfast in September 2004. Invest Northern Ireland contributed GBP 168,000 of the total investment of GBP 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, and it still appears there, meaning that it has still between 11 and 25 employees.

Compliance with Northern Ireland 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 the 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."



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Underrepresentation analysis: The company appears in the Register of Employers, meaning that it has from 11 to 26 employees. MSCI's Northern Ireland service did not find information about Microsoft's workforce in Northern Ireland. As a result, no underrepresentation assessments were made.

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.



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NACCO Industries, Inc.

Operations in Northern Ireland:

Nacco Materials Handling

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

• **Nacco Materials Handling**

Location	Craigavon, Co. Armagh
Business	Industrial fork lift trucks
Employees	(Data as of 2010)
	Protestant 340
	Catholic 247
	Other 28
	Total 615

2010 Survey Response: None

Available information: The company had consistently responded to monitoring by the Northern Ireland Service, though it did not respond in 2008 or 2009. 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. In 2008, the Portadown Times reported that around ninety jobs were at risk at Nacco Materials Holdings. The employers were told that it was due to a reduction of orders in United States. The management was said that it believes that its factory was overstaffed. About 120 temporary employers were already been laid off by Nacco. Kieran Lavery, senior shop steward, said that the union and the management are in cooperation regarding the issue.

Compliance with Northern Ireland 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.



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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. There have not been any redundancies from 2006 to 2009, but in 2010 the company workforce decreased by about 9.69 percent aggregate. As data from the Equality Commission shows: Catholics decreased by 11.79 percent (384 to 340 employees), Protestants by 11.46 percent (280 to 247 employees), whereas non-affiliated increased by 64.71 percent (17 to 28 employees). The workforce community representation remains substantially unchanged. The report also disclosed that out of 615 employees: out of 61 new hires, 16 belonged to the Protestant community (36.4 percent), whereas 28 new hires belonged to the Catholic community (63.6 percent) as of December 2010.

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



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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.

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 target 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 proved to be the case when Catholic representation has grown along with recruitment in 2004 and 2005. Since then, staff levels have declined slightly.

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, two were withdrawn and one was dismissed. 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.

MSCI

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Office Depot, Inc.

Operations in Northern Ireland:

Office Depot International Ltd.

MacBride Agreement	Yes	Protestants	Unknown	FET Discrimination Findings	0
		Underrepresented			

Catholics	Unknown
Underrepresented	

Agreement Date	5/1/2006	Affirmative Action	Unknown	FET Settlements	0
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• **Office Depot International Ltd.**

Location Belfast

Business Office supplies

Employees (Data as of 2010)

Protestant

Catholic

Other

Total 24

2010 Survey Response: None

Available information: The company has had between 28 and 34 employees working at its Belfast office supplies store until 2008. As of 2009, it is no longer included in the Equality Commission Monitoring Report. As of 2010, neither it is included in the Register of Employers. It is concluded therefore that the company currently employs fewer than ten workers. Office Depot responded to the Northern Ireland Service survey in 2005 and 2006, but has not responded since.

Compliance with Northern Ireland fair employment law and Code of Practice: The company reports that its policies are in line with the Code of Practice. Managers at the Northern Ireland operations oversee the company's equality policy, ensuring procedures are in line with standards issued by the Equality Commission. Site managers report to the Director of Human Resources who produces an annual report on EEO programs for the UK and Ireland management board as well as the Vice President of Human Resources Europe. Office Depot does not always publicly advertise available positions at the company, but it does notify all employees. It uses the Belfast Telegraph, the Internet and the company intranet to advertise positions and it always ensures interview panels are comprised of members of both communities. Interviewees are not required to undergo EEO



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training and the company does not systematically review the community composition of the applicant pool. Office Depot reports that its redundancy policy "clearly states clear selection criteria for redundancy selection that is objective and non-discriminatory."

Underrepresentation analysis: The company is not included in the Equality Commission Register of Employers, (which lists all employers whose workforce is greater than ten employees). The company has therefore dropped further from past years, to fewer than ten employees in Northern Ireland.

MSCI's Northern Ireland Service refrains from drawing underrepresentation assessments when the company's workforce in Northern Ireland is not greater than 30 employees.

As of 2007, fewer than 10 employees at Office Depot International are Roman Catholics. In 2006, the last year for which full data are available, one-third of 24 employees with known community affiliation were Catholic, precisely in line with the 37.1 percent Catholic catchment area for the company. Office Depot employs workers in two job categories, sales associates whose recruitment area includes all of Northern Ireland and machine operatives whose more narrow recruitment area is the Belfast travel-to-work region.

Conformance with MacBride principles: In May 2006, the company indicated its policies were consistent with the MacBride principles. It also agreed to respond to further monitoring inquiries. To ensure compliance with the MacBride principles, the company reports that "all senior and line management within the company are fully trained in the company respect and dignity in the workplace policy. All management also attends the company's strategic leadership program, which is a recognized accreditation and managing diversity in the workplace is a topic that is given serious consideration."

Affirmative action outreach: No affirmative action appears to be warranted. The company places an EEO statement in its employment advertisements.

Chill factor and neutral workplace: The company is located in a commercial area near downtown Belfast that is near heavily Protestant neighborhoods, but it should not be subject to a substantial chill factor. Office Depot has a health and safety policy that provides instructions on how to deal with threats. The firm also reported that it has given employees paid time off when violence has broken out in Belfast. All employees receive training on anti-sectarianism in the workplace, using materials from the Equality Commission.

Grievances: No fair employment grievances have been filed against the company at the Fair Employment Tribunal.



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Pepsico, Inc.*Operations in Northern Ireland:**Walkers Snacks Ltd.*

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

• **Walkers Snacks Ltd.**

Location	Antrim
Business	Crisps
Employees	(Data as of 2010)
	Protestant 22
	Catholic 11
	Other 1
	<u>Total 34</u>

2010 Survey Response: None

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 company responded to the Northern Ireland Service survey in 2006, but has not responded since.

Compliance with Northern Ireland 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.



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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 are fairly represented when considering the Antrim travel to work area (the most appropriate catchment area given the company activities). The company's facility is located in Antrim (38.5 percent Catholic), whose representation is respected in the company workforce. According to the 2009 Equality Commission Monitoring Report, the company employs 34 employees, whereof 22 are Protestant, 11 Catholic, and one non-affiliated, with a resulting 33.3-percent Catholic representation. This has been slightly but constantly decreasing from 2006, when Catholics made up 40 percent of the company's workforce.

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 but not thereafter.

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 in 2007 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 time frame to handle grievances



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and informs employees that a colleague and/ or a representative from human resources may assist them in this process.

Raytheon Company

Operations in Northern Ireland:

Raytheon Systems

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

• Raytheon Systems

Location	Derry, Co. Londonderry
Business	Software development center
Employees	(Data as of 2010)
	Protestant 13
	Catholic 33
	Other 0
	Total 46

2010 Survey Response: None

Available information: The company has sporadically responded to the Northern Ireland Service survey. In 2005 it provided updated employment figures and in 2006 it submitted a full survey response, but it did not respond in 2007, submitted only partial information in 2008, and did not respond again in 2009 or 2010. Employment appears to have fallen short of initial goals, and the



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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 USD 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 Northern Ireland fair employment law and Code of Practice: The company provided the Northern Ireland Service with a copy of its fair employment policy in 2006, but has not provided a more recent copy. 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. Personnel 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. UK managers oversee the company's equality policy.

Underrepresentation analysis: The company does not figure in the 2009 Monitoring Report, but it is in the Register of Employers, meaning that it employs between 11 and 25 workers.

MSCI's Northern Ireland Service refrains from underrepresentation assessment when the workforce is not greater than 30 employees.

In past monitoring periods, Protestants have appeared to be slightly underrepresented, although in 2008 both communities seemed fairly represented. Derry travel to work area is mainly Catholic (69.8 percent), and community representation at Raytheon was, until available) in line with these figures, although Protestants appeared to be slightly underrepresented. However, when comparing this



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data with all Northern Ireland, the most appropriate catchment area given the company business type, Protestants appeared to be clearly underrepresented.

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, although its last full response dates back 2006.

Affirmative action outreach: There is no evidence supporting the undertaking of affirmative action at the company.

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 and to raise complaints with someone other than an immediate supervisor, and it will accommodate requests to bring grievances to a co-religionist.



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The AES Corporation

Operations in Northern Ireland:

AES Kilroot Power

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

• AES Kilroot Power Ltd.

Location Carrickfergus

Business Electricity generation

Employees (Data as of 2010)

Protestant 108

Catholic 16

Other 1

Total 125

2010 Survey Response: None

Available information: AES owns more than 90 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 GBP 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.

Until 2009, 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.



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Compliance with Northern Ireland 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: According to the Equality Commission's 2009 Monitoring Report, Protestants composed 87.1 percent of Kilroot's affiliated employees, while Catholics represented the remaining 12.9 percent. The workforce fairly represented both groups considering the 2001 census data for Carrickfergus, the area of the company's operations. However, the Catholics appeared to be severely underrepresented considering the whole Northern Ireland as a catchment area (42.7 percent Catholic). As of the December 2010 monitoring period, the latter assessment appeared to be the more appropriate as the company's employees belong to high employment categories (SOC1, SOC3, and SOC4).

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.

Grievances: No recent complaints have been filed against the company at the Fair Employment Tribunal as of August 2009. The company's grievance policy allows employees to file complaints confidentially and to raise issues with someone other than their immediate supervisor.



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The Allstate Corporation

Operations in Northern Ireland:

Allstate Northern Ireland

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

• Allstate Northern Ireland

Location	Belfast, Derry, Strabane
Business	Call centers, IT services
Employees	(Data as of 2010)
	Protestant 478
	Catholic 837
	Other 292
	Total 1607

2010 Survey Response: None

Available information: NorthBrook Technology opened its Belfast facilities in 1999 and changed locations within Belfast in 2002, and has changed name into Allstate Northern Ireland. The company has grown substantially since its founding and currently employs 1,607 full-time workers, growing its workforce by 8.3 percent company-wide from the previous survey response, when it listed 1,483 employees. Company representatives said they are focused on 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. This trend is shown in the community breakdown, outlined above, where non affiliated employees are more represented than in other companies in the country, and is confirmed by the non-affiliated rate of applications and new hires, where they are greater than Protestants. 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. (Allstate refers to the latter site as Magee to avoid sectarian labels of Derry or Londonderry). The company workforce increased also last year by 8.4 percent since last monitoring period, quite homogenously spread among the communities, with a slight Catholic majority (Protestants grew by 7.7 percent, Catholics by 10.1 percent, and non affiliated by 4.7 percent. InvestNorthern Ireland



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contributed £5.5 million to the new Strabane location, which is to produce 260 jobs. The Strabane facility currently employs 402 workers. The company has regularly responded to monitoring by the Northern Ireland Service and Service staff meet with company representatives in 2005.

Compliance with Northern Ireland fair employment law and Code of Practice: The company's policies adhere to the standards established by the Fair Employment and Treatment (Northern Ireland) Order 1998, and follow 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 Allstate is always interested in talented workers and therefore places constant recruitment ads in the newspapers. All employees are notified through company intranet about positions open to internal applicants. As far as external applications are concerned, the company 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, the company reported in its latest survey response. 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. Allstate 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 Allstate "can't afford to have poor fair employment practices."

Allstate 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. According to the company latest company response, Northern Ireland senior management oversees the company's equality policy in Northern Ireland, although Managers in Northern Ireland said in a previous response that U.S. senior managers are knowledgeable about Northern Ireland equality issues and regularly visit the Belfast office. In June 2006, this office won an award for its Diversity and Equality Programme.

Underrepresentation analysis: Protestants appear to be underrepresented at Allstate when the work force is compared to site-specific catchment areas. Company-wise, Catholics are twice as Protestants (63.7 and 36.3percent). As of December 2010, this data is not available with location per



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location breakdown, therefore all of Northern Ireland is deemed be the most appropriate catchment area. According to this, Protestants appear underrepresented.

From previous responses, Allstate 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. Protestants are underrepresented in each of the three workplaces, particularly among managers and professional occupations. In Strabane, Catholics accounted for 278 of 402 employees at the facility, whereof 265 are employed only within SOC7 Sales/Customer Services.

The company's efforts in recruiting from the ranks of the unemployed 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 said in the previous survey response that 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. In 2009, out of the 1,835 received applications, only 374 were sent by Protestants (27 percent) where as 941 were sent by Catholics (70.2 percent) and the resting 520 applications were sent by non affiliated (38.8 percent, confirming the company's strategy to attract non locals, at least for IT-skilled jobs). Looking at figures for new hires, these numbers are more equaled. Despite the Catholic presence is still overwhelming (79 percent), 32 percent of new hires declared to be Protestant, whereas the affiliation of a 36.9 percent of new hires was not possible to determine. The company reported in its previous survey response that it did not believe any group is underrepresented at its operations, noting that the Equality Commission had not raised any concerns about its annual monitoring return.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation in November 2000. Allstate told the New York City comptroller at the time, "We have and will continue to make all lawful efforts to conduct operations in Northern Ireland in accordance with applicable fair employment standards and practices, including those embodied in the MacBride principles." The company also confirmed in its latest survey response it would continue to cooperate with monitoring by the Northern Ireland Service.

Affirmative action outreach: Data suggest that Allstate is obligated to try to attract more Protestant applicants. Allstate disagreed. The company participates in several outreach initiatives to train



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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. Allstate 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.

Grievances: The Northern Ireland Service is unaware of any complaints filed against the company at the Fair Employment Tribunal. In its latest survey response, the company disclosed that its grievance procedure for complaints of religious or political discrimination provides for both filing a complaint confidentially, to someone other than the direct supervisor, and to a clearly independent person of the same community background.

The Coca-Cola Company

Operations in Northern Ireland:

Coca-Cola Hellenic Bottling Co

MacBride Agreement	Yes	Protestants	No	FET Discrimination Findings	2
		Underrepresented			

		Catholics	No		
		Underrepresented			

Agreement Date	9/1/2004	Affirmative Action	No	FET Settlements	2
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• **Coca-Cola Hellenic Bottling Co**

Location	Lisburn and Omagh	
Business	soft drink bottling	
Employees	(Data as of 2010)	
	Protestant	430
	Catholic	257
	Other	53
	Total	740

2010 Survey Response: None

Available information: The company has responded in full to the Northern Ireland Service survey for the last few years, although not in 2010. Northern Ireland Service staff met with company representatives in 2005. Coca-Cola owns what it terms a "non-controlling ownership interest" in



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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. 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 are 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 Northern Ireland 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."



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Employees receive EEO and harassment training, which outlines their "personal responsibility as employees and the consequences of non-compliance." The company says it manages all redundancies "according to the specific circumstances," and that there are "no blanket rules for all occasions," although it never makes employees redundant on a last in-first out basis. All redundancies are managed in concert with the company's trade union.

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

Underrepresentation analysis: According to the Equality Commission's 2009 Monitoring Report, Coca Cola's total number of employees is at 687, with 430 Protestants (62.6 percent), 257 Catholics (37.4 percent) and 53 unaffiliated. The company also reports that it hired 179 employees during the year, wherein Protestants consists of 52.5-percent of new hires, Catholics at 34-percent, and the unaffiliated at 13.4 percent.

From previous survey responses, both communities appeared to be fairly represented overall at the company's operations in Lisburn (where the majority of employees work). However, Protestants were underrepresented among the professional (SOC3) and administrative (SOC4) job classes, which make up over a fifth of all positions, and Managers (SOC1) are in majority Catholics (37 versus 33 Protestants). Moreover, at the Omagh facility (a warehouse and delivery depot, which has 19 employees), Catholics are thrice as Protestants (15 employees to 5). Coca-Cola reported in previous survey responses that nearly 60 percent of its workers live in the Belfast travel-to-work area; the rest live throughout Northern Ireland. In the latest monitoring period, the company received 730 applications (almost equally distributed between 327 Protestants and 308 Catholics), whereof Catholics applied in greater amount for SOC1 and SOC3 positions. These resulted in 153 new hires (77 Protestants and 57 Catholics), where the only Catholic greater representation is registered within the SOC1. As far as redundancies are concerned in the latest monitoring period, Coca-Cola reported that Protestant redundancies (mainly in SOC8 Process, Plant & Machine Operatives) were thrice the Catholic."

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



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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. In a report released in 2006, New York City Comptroller William C. Thompson, Jr., said as Coca-Cola agreed to urge franchise holders in Northern Ireland to implement the Principles and adhere to fair employment standards to foster a diverse workforce. Coca-Cola also promised to comply with monitoring by the Northern Ireland Service. In its most recent survey response, the company reported that "Compliance [with the MacBride Principle] is monitored and reported at local board meetings to the Directors of the Company".

Affirmative action outreach: No affirmative action measures appear warranted, nor needed overall at the company. Coca-Cola said 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 statement 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 earlier. It has not had any recent problems.

Grievances: In the last two years, two separate complaints were filed by the same plaintiff before the FET, on Aug. 22, 2008, and Nov. 18, 2009: both claims were withdrawn after settlement on May 14, 2009.

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The Estee Lauder Companies Inc.

Operations in Northern Ireland:

Estee Lauder Cosmetics Ltd.

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

• Estee Lauder Cosmetics Ltd.

Location	Belfast
Business	sale of cosmetic products
Employees	(Data as of 2010)
	Protestant 31
	Catholic 42
	Other 10
	<u>Total 83</u>

2010 Survey Response: None

Available information: In 2005, Estee Lauder reported its largest staff ever in Northern Ireland at 128 workers; this has since fallen significantly, to 95 workers in mid-2006 and 60 by the end of 2007, and increased again up to 83 in 2010. The company only employs sales associates, who sell cosmetics in department stores around the province.

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



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on "competence, conduct, attendance and service," which are also the criteria for promotion. UK management oversee the company's equality policy.

Underrepresentation analysis: According to the Equality Commission's 2009 Monitoring Report, Catholics composed 57.5 percent of Estee Lauder's affiliated employees, while Protestants represented the remaining 42.5 percent. Estee Lauder's only employment category in its Northern Ireland operations are sales associates who work at various locations. These employees were compared to a catchment area that includes all of Northern Ireland (57.3 percent Protestant), which is deemed the most appropriate catchment area given the employees category (sales). Protestants in the company (42.5 percent) appear thus to be underrepresented.

Conformance with MacBride principles: The company reached an agreement with shareholder proponents of the MacBride principles in 1998 and Estee Lauder implemented them.

Affirmative action outreach: Long-term applicant and hiring figures may suggest a need for affirmative action for any group.

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

Grievances: No recent complaints have been filed against the company at the Fair Employment Tribunal. The company's grievance procedure allows for employees to raise confidential complaints and to raise issues with someone other than their direct supervisor.



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The Gap, Inc.

Operations in Northern Ireland:

GPS (Great Britain) Ltd.

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

• **GPS (Great Britain) Ltd.**

Location Belfast (2 locations) and Banbridge

Business Retail clothing

Employees (Data as of 2010)

Protestant 30

Catholic 17

Other 8

Total 55

2010 Survey Response: Full

Available information: The Gap regularly responds to the Northern Ireland Service surveys, providing work force data and descriptions of its fair employment practices. It owns and operates two retail clothing stores in the Belfast city center that are part of Gap's subsidiary GPS (Great Britain) Limited. There have not been any redundancies for the past few years, a trend confirmed in the 2009 survey, and the work force has remained stable with about 40 to 50 part' and full-time workers (55 in 2009). Part-time workers make up 65 percent of Gap's staff in Northern Ireland. In the response to the 2009 survey, Gap has reported to have 19 full-time workers in three locations.

Compliance with Northern Ireland fair employment law and Code of Practice: The Gap says it complies "with all relevant regulations" of local fair employment law, the Code of Practice, and the MacBride principles. The company includes an EEO statement in its advertisements and always notifies employees about positions open to internal applicants. It also recruits through government-sponsored job fairs held in designated areas. Employees involved in candidate selection sometimes receive equal employment training, and the company says it only authorizes managers trained in applicant screening and interviewing to recruit candidates. According to the company, all



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employees participate in training on workplace discrimination issues, and "may contact their line manager, district manager or human resources department to express any concerns." The Gap's human resources department monitors the company's work force composition, and the district, regional human resources and recruitment managers all visit regularly "to confirm that the fair employment procedure is being followed.", Moreover, U.K. management oversees the company's equality policy. Gap has not made any employees redundant, but it has a procedure in place that provides payment packages more generous than that required under UK law. Its district manager and human resources support are trained "to monitor practices in stores to identify and implement improvements."

Underrepresentation analysis: According to the Equality Commission's 2009 Monitoring Report, Protestants composed 63.8 percent of Gap's affiliated employees, while Catholics represented the remaining 36.2 percent.

No group appeared to be underrepresented at the Gap's stores when comparing to all of Northern Ireland (57.3 percent Protestant).

As far as full-time workers are concerned, Gap provided the Northern Ireland Service with a breakdown by store in previous survey response. Disaggregating the data per town, in the Belfast travel-to-work area (67 percent Protestant) Protestants may appear underrepresented at Gap's stores (50 percent). The Banbridge travel-to-work area is 69 percent Catholic and this rate is in line with the 75-percent Catholic representation at the local Gap's store. However, an accurate underrepresentation analysis cannot rely on these small numbers; the Northern Ireland service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. The company told MSCI it will respond to the 2010 survey.

Previously, in 2008 management reported that "Due to staff turnover in our UK office, we were not able to retrieve data at a store level. We have reported the information contained here as a total of our three Northern Ireland stores." However, the company employed then 15 full-time workers whose religion has not been identified. The lack of reported community affiliation may raise a red flag about the adequacy of the company's monitoring procedure. Northern Ireland fair employment law requires employers to deduce an employee's community background from data on the schools attended and other personal factors, if they do not indicate a background."

Conformance with MacBride principles: The company says its policies reflect the fair employment standards embodied in the MacBride principles and it has responded regularly to the Northern Ireland Service's surveys. Gap shareholders have never voted on shareholder resolutions specifically requesting implementation of MacBride, the usual route to agreements between companies and



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MacBride advocates. It meets the conditions of such agreements and agrees that its policies reflect the fair employment standards embodied in the principles. The Minnesota State Board of Investment withdrew shareholder resolutions asking for reports on the operation in 1995 and 1996 after the company prepared the reports.

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

Chill factor and neutral workplace: The company's two locations in downtown Belfast should not pose a chill factor to either Catholics or Protestants.

Grievances: "The company reported that an individual filed a discrimination claim against a former store manager in 2004. The case was dismissed in 2005. At the time of the filing, a Gap representative said, "the claimant has been in breach of a tribunal order with respect to this claim for many months" and that "on this basis, we expect the claim to be struck out of court which will be decided in a pre-hearing." No other complaints have been filed against Gap at the Fair Employment Tribunal.

Gap has a grievance policy that strictly outlines formal and informal procedures for dealing with complaints and allows the parties to appeal a decision twice before a Senior Manager renders a final decision. The company encourages employees to relay grievances to their supervisors, their supervisor's superior, or human resources. The company also has an employee assistance program, called LifeWorks, which is there to provide advice and support to employees dealing with workplace issues."



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The Goodyear Tire & Rubber Company

Operations in Northern Ireland:

Goodyear Dunlop Tyres UK Ltd.

Hi-Q Tyre Service

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

• Goodyear Dunlop Tyres UK Ltd.

Location	not disclosed
Business	Tyre services and sales
Employees	(Data as of 2010)
	Protestant
	Catholic
	Other
	<u> </u>
	Total 1

2010 Survey Response: None

Available information: Before 2002, Goodyear had a stake in a Northern Ireland firm called Dunlop Tyres through a joint venture with Sumitomo Rubber Industries; this venture was dissolved and the retail operations sold to third parties in 2002. The company responded to the 2009 survey with a letter confirming it has one sales employee in Northern Ireland, and no other employees located in Northern Ireland. Therefore, the company did not see pertinent to provide any further detailed information. Goodyear also has franchises in Northern Ireland operating under the Hi-Q Tyre Service name.

Compliance with Northern Ireland fair employment law and Code of Practice: Goodyear said to MSCI in 2009 that "with respect to the remaining limited employment, consistent with past practice, Goodyear Dunlop Tyres Limited UK intends, consistent with existing law, to implement fair employment practices embodied in the MacBride principles." The New York City Comptroller's office



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added the company to its list of firms with agreements on implementation in 2000, given this statement and the company's cooperation with monitoring by the Northern Ireland Service.

Goodyear Great Britain was at one time a major Northern Ireland employer, but it closed a large manufacturing plant there in the early 1980s. It is the company's view that "Given these remaining de minimus contacts in Northern Ireland, it doesn't seem pertinent to provide any further detailed information."

• Hi-Q Tyre Service

Location	28 locations province-wide
Business	Tyre services
Employees	(Data as of 2010)
	Protestant
	Catholic
	Other
	Total

2010 Survey Response: None

Available information: Hi-Q Tyre Service locations in Northern Ireland are all owned and operated by dealer partners or franchisees of Goodyear, and are not directly controlled by it. Goodyear authorizes these dealers to use the Hi-Q Tyre Service designation in signage. They combine the former operations of Motorway Tyres & Accessories and former Dunlop Tyres retail operations.

Compliance with Northern Ireland fair employment law and Code of Practice: Goodyear did not provide any information on the fair employment policies of its Hi-Q franchise and dealer companies.

Underrepresentation analysis: Hi-Q reported in its response to the 2009 survey to have 28 locations in Northern Ireland. The company does not appear under this name in Equality Commission reports and the Northern Ireland Service has estimated the total number of employees, figuring about five workers per location. In the same response, the company stated that in 2009 it had one non-affiliated Associate Professional/Technical employee.

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



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The TJX Companies, Inc.

Operations in Northern Ireland:

T.K. Maxx

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

- T.K. Maxx**

Location	Belfast
Business	Retail clothing sales
Employees	(Data as of 2010)
	Protestant 212
	Catholic 234
	Other 16
	Total 462

2010 Survey Response: None

Available information: TJX has responded consistently to the Northern Ireland Service survey since 2006, and in 2009 engaged substantially with the Northern Ireland Service, providing full survey response. In addition to its 162 full-time employees, the company also has 459 part-time employees. As of December 2010, the company has not yet responded to MSCI's Northern Ireland Service survey.

Compliance with Northern Ireland fair employment law and Code of Practice: TJX announced its compliance with the MacBride Principles in the spring of 2009, following the withdrawal of a shareholder resolution sponsored by New York City pension funds. The company stated in its 2009 survey response that recruitment and selection in Northern Ireland are often advertised in local newspapers, via recruitment agencies, and internet, and all employees are aware. They are based on merit without regard to any of the above factors, including religious belief, community background, or political opinion. More specifically on Northern Ireland, within the company's hiring procedure candidates are always interviewed by a panel with multiple interviewers, from both communities, whose panelists have undergone equal opportunity employment training, and after



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examining the religious composition of applicants and new hires in order to determine success rate. Training is eventually provided for all employees and company legal advisers. Broadly, TJX told RiskMetrics to be insisting “on equality of opportunity in Northern Ireland as well as in the other countries in which we operate. We strongly support ongoing efforts to eliminate discrimination in Northern Ireland. Accordingly, we endorse the broad fair employment standards embodied in the MacBride Principles where implemented consistent with the law of Northern Ireland.”²

Underrepresentation analysis: According to the Equality Commission’s 2009 Monitoring Report, Catholics composed 52.5 percent of TJX affiliated employees, while Catholics represented the remaining 47.5 percent. The company also disclosed that it hired 164 employees in the last monitoring period, of which 64 are Protestants (41 percent), 92 are Catholics (59 percent), and eight (4.9 percent aggregately) are unaffiliated.

The religious composition of the company’s work force has changed substantially since 2007, moving from a majority Catholic work force to a more evenly balanced composition. As of TJX’s 2009 survey, employment is equally distributed among the two communities. 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. Protestants were overrepresented among applicants for Sales/Customer Service positions, with the company reporting 1,115 Protestant applications and only 169 from Roman Catholics.

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.



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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 in the 2009 survey response. 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." As far as equality enforcement is concerned, the company told MSCI it follows the guidelines of the Equality Commission for Northern Ireland, senior management is responsible for oversight of the company's equality policy in Northern Ireland, and grievance procedure for complaints of religious or political discrimination provides for filing a complaint to someone other than a direct supervisor.

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 2006, 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



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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.



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United Technologies Corporation

Operations in Northern Ireland:

Chubb (Northern Ireland) Ltd

Otis Elevator

Toshiba Carrier UK

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

• Chubb (Northern Ireland) Ltd

Location Belfast

Business Security and fire

Employees (Data as of 2010)

Protestant

Catholic

Other

Total 70

2010 Survey Response: None

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. Company representatives have said they expect sustained peace in Northern Ireland will spark increased investment and demand for their products.

Compliance with Northern Ireland fair employment law and Code of Practice: In 2006, Chubb provided copies of its EEO, grievance, affirmative action and harassment policies to the Northern



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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 the 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: Neither group appears to be underrepresented at Otis Elevator as of 2010. In previous years, when Catholics appeared to be slightly underrepresented, the company had said that it had difficulties finding skilled Catholic lift engineers with prior experience, but that it was addressing this issue through an engineering apprentice program. Applicant figures reported by



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the company during the most recent monitoring period still reflect this problem. The company hired five people in the 2008 monitoring period.

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 its 2006 survey response Chubb reported that its policies reflect the principles and agreed to complete the annual survey. The company did not respond to the Northern Ireland Service's 2007 survey, but resumed replying in 2008.

In 2005, company representatives told the Northern Ireland Service that that emblems have been banned from the workplace. UTC's other companies have successfully implemented the MacBride principles. Chubb representatives told the Northern Ireland Service that implementing the MacBride principles 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 was 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 affirmation 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 begin 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."



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Chill factor and neutral workplace: In past years, Catholics were significantly underrepresented in the work force overall and in several employment categories. In 2010, the company employs fewer than ten Catholics out of a workforce of 70 employees (13 percent in the best-case scenario, that is in case Catholic employees were nine), leading to a clear underrepresentation with respect to the appropriate catchment areas: either Belfast (33 percent Catholic) or all of Northern Ireland (42.7 percent Catholic).

Previously, 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 shrunk 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 the most recent monitoring period, Catholics still appear to be underrepresented, but to a much lesser degree than in previous periods. Chubb commented in its 2008 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."

The company provides security and fire protection systems to its customers. The security industry in Northern Ireland has been heavily Protestant over the years, and 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."

Grievances: No fair employment grievances have been filed against the company in recent years. Chubb and the trade union representing its workers have developed to a grievance policy, which includes provisions for a formal hearing and/or the use of an arbitration body. The UTC dialog and ombudsman programs also provide a confidential and secure environment for employees to raise complaints.

• Otis Elevator

Location	Belfast
Business	elevator sales, service, repair and installation
Employees	(Data as of 2010)



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Protestant	24
Catholic	14
Other	4
Total	42

2010 Survey Response: None

Available information: Otis Elevator has consistently responded to the Northern Ireland Service survey, but in 2009 and 2010.

Compliance with Northern Ireland 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: Neither group appears to be underrepresented at Otis Elevator as of 2010. In previous years, when Catholics appeared to be slightly underrepresented, the company had said that it had difficulties finding skilled Catholic lift engineers with prior experience, but that it was addressing this issue through an engineering apprentice program. Applicant figures reported by the company during the most recent monitoring period still reflect this problem. The company hired five people in the 2008 monitoring period.

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 UK law. The company said the principles



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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.

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.

- **Toshiba Carrier UK**

Location	Belfast
Business	Air conditioning/refrig. installation & maintenance
Employees	(Data as of 2010)
	Protestant
	Catholic
	Other
	<u>Total</u> 0

2010 Survey Response: None

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

Compliance with Northern Ireland fair employment law and Code of Practice: 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.



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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 UK 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. Toshiba is no longer on the Registers of Employers as of September 2009, meaning that it has fewer than 11 employees.

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

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

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.



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Vornado Realty Trust

Operations in Northern Ireland:

Toys 'R' Us

MacBride Agreement	Yes	Protestants Underrepresented	No	FET Discrimination Findings	0
		Catholics Underrepresented	No		
Agreement Date		Affirmative Action	No	FET Settlements	1
• Toys 'R' Us					
Location	Newtownabbey and Londonderry				
Business	Toy retailing				
Employees	(Data as of 2010)				
	Protestant	60			
	Catholic	49			
	Other	7			
	Total	116			

2010 Survey Response: None

Available information: According to the Toys 'R' Us Web site as of May 2010, the company operated as a public company from 1978 until July 2005. At that time, an investment group consisting of affiliates of Bain Capital Partners LLC, Kohlberg Kravis, Roberts & Co. (KKR), and Vornado Realty Trust, completed its acquisition, encompassing all worldwide operations. Each of the investors owns an equal stake in Toys 'R' Us. 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. A second store opened in Londonderry in 2007. The two stores sell toys, baby care and family leisure and home entertainment multimedia products.

Compliance with Northern Ireland 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



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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 a world-wide 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 (57.3 percent Protestant). According to the 2009 Equality Commission Monitoring Report, the company workforce consists of 60 Protestants (55 percent), 49 Catholics (45 percent), and seven non-affiliated. However, from previous responses, the company told MSCI that two locations are in one heavily Protestant area (Newtownabbey) and in a heavily Catholic one (Londonderry). Therefore, this assessment may vary depending on the community breakdown by location, which the company did not provide. Employees at Toys R Us are either managers or sales associates and both of these employment categories have the widest recruitment area, all of Northern Ireland.

Conformance with MacBride principles: Toys R Us reached an agreement on implementation of the MacBride principles in April 1999 after receiving a shareholder proposal, but the companies that acquired Toys R Us have not endorsed the principles.

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

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 in



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located in a predominately Protestant neighborhood which could be off-putting to Catholics.
Workers travel

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



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Wal-Mart Stores, Inc.

Operations in Northern Ireland:

Asda Stores Ltd.

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

• **Asda Stores Ltd.**

Location 14 locations across Northern Ireland

Business Supermarkets

Employees (Data as of 2010)

Protestant 1954

Catholic 1868

Other 45

Total 3867

2010 Survey Response: None

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 14 locations throughout Northern Ireland and employs of the largest work forces in the region. Wal-Mart has responded in full to Northern Ireland Service surveys since 2006, but not in 2010.

Compliance with Northern Ireland fair employment law and Code of Practice: In past survey responses, Asda provided comprehensive information on its policies and procedures regarding harassment, hiring and selection and EEO issues. The policies adhere to the standards established in the Code of Practice. Asda has won several awards for its positive work environment, including "best place to work awards" from Fortune magazine, and The Sunday Times newspaper, and it says it "works tirelessly to continue to earn and maintain that reputation." Asda's statement on equal opportunities attached to its survey response maintains that the company "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 (the USDAW) on a monthly basis, and it uses a



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software package recommended by the Equality Commission to monitor its work force. All employees are regularly briefed about the EEO policies that are in place.

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 in either of the two last monitoring periods, 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 work force."

Northern Ireland senior management, U.K. management, and Corporate headquarters oversee the company's equality policy in Northern Ireland, and harassment based on religion or political opinion can be reported filing a complaint confidentially and to someone other than the direct supervisor.

Underrepresentation analysis: Both communities appear to be fairly represented in the work force at Asda. The company has 14 locations throughout Northern Ireland, making the region as a whole the best comparison for composition of the staff. According to the Equality Commission's 2009 Monitoring Report, Asda has only 45 workers whose religion is not identified, indicating that the company's monitoring process is comprehensive and accurate. Protestants account for 51.1 percent of employees, while the remaining 48.9 percent are Catholics, which is not far off from the 57.3-percent Protestant and 42.7-percent Catholic share of the available work force in Northern Ireland, according to the country's 2001 Community Census. In previous survey responses, Asda agreed that its work force should be compared to all of Northern Ireland as it said to undertake "a multi-site retail operation throughout Northern Ireland and requires its managers to be flexible in terms of work location."

In 2008 Asda stores hired nearly 900 new workers, of whom 57 percent were Catholic. In 2009, the company hired 939 new employees, whose community representation was distributed as follows: 47.6 percent Protestant, 52.4 percent Catholic, and 12 non-affiliated hirings. The greatest Standard Occupation Classification for hiring was Customer service, with 742 new hires, only 12 (1.3 percent) of which did not declare membership in either community.



Conformance with MacBride principles: Wal-Mart has reported that its policies adhere to the standards embodied in the MacBride principles and it has agreed to comply with monitoring by the Northern Ireland Service. Asda notes that, "it does not provide security for the protection of its employees."

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: In 2009, one former Asda employee filed two claims against the company. Those claims are still pending. The company's grievance policy sets out a clear procedure for handling employee complaints that allow workers to voice complaints without fear of victimization. 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 also issues with their human resources representative and/or to their union representative.

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Watson Pharmaceuticals, Inc.

Operations in Northern Ireland:

Nicobrand Ltd.

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

• **Nicobrand Ltd.**

Location	Coleraine	
Business	Bulk chemical processing	
Employees	(Data as of 2010)	
	Protestant	
	Catholic	0
	Other	0
	<hr/> Total	<hr/> 26

2010 Survey Response: None

Available information: 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 25 employees. Namely, it has 26 as of 2010.

Compliance with Northern Ireland 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.



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Underrepresentation analysis: According to the 2009 Monitoring Report, Nicobrand employs 26 workers, less than ten of whom is Catholic.

However, given the small numbers, an accurate underrepresentation analysis is not possible. MSCI's Northern Ireland Service does not draw any conclusions from statistical assessments on work forces that have fewer than 30 employees. Still, from previous survey responses there did 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 few employees each year, but the community still appeared to be well represented.

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.



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Yum! Brands Inc.*Operations in Northern Ireland:**Herbel Restaurants**Restaurant Management Services Ltd.*

MacBride Agreement	No	Protestants	No	FET Discrimination Findings	0
		Underrepresented			

Catholics	No
Underrepresented	

Agreement Date	Affirmative Action	No	FET Settlements	0
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- Herbel Restaurants**

Location	province-wide
Business	KFC fast-food restaurants
Employees	(Data as of 2010)
	Protestant 180
	Catholic 168
	Other 270
	<u>Total 618</u>

2010 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 2007 proxy statement that its franchise businesses in the region are already required by law to adhere to the Fair Employment & Treatment (Northern Ireland) Order 1998, and "we do not believe it is necessary or appropriate for the Company to attempt to force its franchisees to adopt similar but not identical fair employment guidelines that overlap with the existing laws of Northern Ireland." Information on the overall work force composition of Herbel 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 Herbel Restaurants has taken some action recently to reform its fair employment practices.



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KFC opened its first UK outlet in 1965 and since 2000 has been expanding rapidly, with more than 500 outlets in England, Scotland and Northern Ireland. A private Belfast firm, Herbel Restaurants, holds the Northern Ireland KFC franchise. Significant unanswered questions exist about fair employment matters at Yum Brands' operations in Northern Ireland, years after a sectarian loyalist mural was removed from one of the KFC outlets in north Belfast. Death threats against Catholics working at two other KFC outlets also were reported in 2002. Several Belfast sources indicated that the mural, on the lower Shankill Road just outside central Belfast, was painted because of internecine feuding between different loyalist groups about territory and control of illicit business in the area, a turf battle that was later resolved at least for 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 Northern Ireland fair employment law and Code of Practice: Yum Brands provided no information about the fair employment policies of Herbel Restaurants. A separate inquiry directed to Herbel Restaurants also elicited no response. The loyalist paramilitary mural on the Shankill Road KFC outlet in Belfast was a clear violation of the neutral workplace provisions of Northern Ireland's fair employment law. But nobody filed a formal complaint about it and the Equality Commission itself found the issue too sensitive to broach.

Underrepresentation analysis: Also in 2010, Herbel Restaurants reported that over one-third of its employees (270 on a total of 618 employees) do not come from an identifiable religious community—particularly striking in light of the fact that in previous monitoring periods (such as 2007), over 90 percent of employees were classifiable based on community—may be a sign of significant flaws in the company's fair employment monitoring.

While considering the community-affiliated workforce as of the 2009 Monitoring Report for Northern Ireland (348 employees), Protestants amount to 51.7 percent. Neither community appears then to be underrepresented while considering all of Northern Ireland (57.3 percent Protestant) as the most appropriate catchment area (given the province-wide distribution of the company's operations). This proportion is respected also at hiring statistics: as of 2010, 57 percent of new hirings were Protestant, although also in this case a clear assessment cannot be drafted, given the high number of non-affiliated hirings (147 out of 315).

For many years, Catholics appeared to be slightly underrepresented when the work force of Herbel Restaurants was 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



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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. Concurrent with the rise in Catholic representation was a halving of the company's reported work force, from 992 in 2004 to 492 in 2006 and 483 in 2007. As of 2010, the company employs 618 workers in Northern Ireland.

Conformance with MacBride principles: A shareholder resolution asking for MacBride implementation at Yum Brands has been voted on annually by the company's shareholders since 2003, usually receiving double-digit support but receiving only from 9.2 percent support in 2008, leaving it ineligible for resubmission until 2011. Yum Brands has regularly opposed the proposal, saying that the MacBride principles are superseded by Northern Ireland's fair employment law, and that it cannot force Herbel 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.

• Restaurant Management Services Ltd.

Location 14 locations province-wide

Business Pizza

Employees (Data as of 2010)

Protestant 66

Catholic 70

Other 21

Total 157

2010 Survey Response: None

Available information: Restaurant Management Services Ltd., which owns and runs all the Pizza Hut franchises in Northern Ireland, announced in 2009 that it would close five of its 14 locations. The 14 Pizza Hut restaurants in Northern Ireland were located 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. (See the Yum Brands-KFC profile for details on a

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controversy involving a sectarian mural painted on the side of a KFC restaurant.) No information is available about fair employment policies at Restaurant Management's Pizza Hut locations.

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

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



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