

**HOW DO FORTUNE 100 CORPORATIONS
ADDRESS POTENTIAL LINKS TO HUMAN
RIGHTS VIOLATIONS IN A GLOBALLY
INTEGRATED ECONOMY?**

**ABA/ASU STUDY ON PUBLICLY AVAILABLE
POLICIES ON FORCED LABOR, HUMAN
TRAFFICKING, AND THE TRADE IN CONFLICT
MINERALS**

A JOINT RESEARCH PROJECT OF:

AMERICAN BAR ASSOCIATION

**MCCAIN INSTITUTE FOR INTERNATIONAL LEADERSHIP
ARIZONA STATE UNIVERSITY**

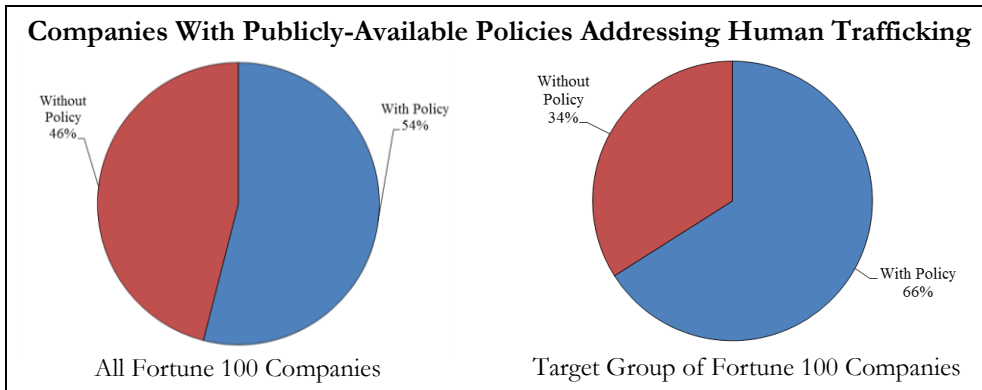
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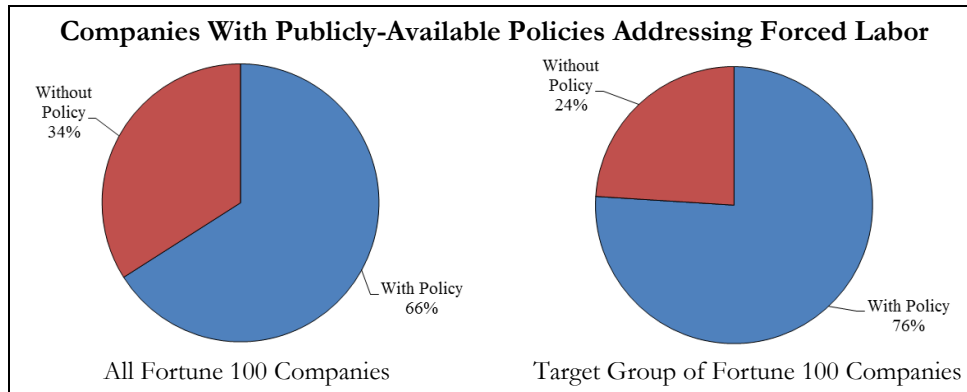
RELEASE DATE: JUNE 2, 2014

PROJECT SUMMARY

This report presents findings from the first ever analysis of Fortune 100 companies’ publicly available policies on three key human rights issues associated with the global economy: forced labor, human trafficking, and the trade in conflict minerals. Our project team reviewed company websites and conducted internet searches to gather and review policies as a key indicator of how major corporations address their potential links to these practices, particularly in relation to global supply chains. We found that more than half of all Fortune 100 companies (54 percent) have publicly available policies addressing human trafficking and that nearly two-thirds (66 percent) have publicly available policies on forced labor.

Some of these companies have limited engagement with international production and global supply chains (such as those working in insurance, banking, and financial services). So, we removed these companies from the analysis, leaving us with 79 companies that we term our “Target Group.” Within the Target Group, nearly two-thirds (66 percent) had publically available policies related to human trafficking and over three-quarters (76 percent) had policies related to forced labor. Because policies regarding the trade in conflict minerals are only relevant for a reduced group of Fortune 100 companies, we report those results separately.





Forced labor and human trafficking produce profound suffering for millions of people around the world while yielding significant profits for violators. The expansion of the international economy and the complex, multi-tiered nature of global supply chains sometimes links major corporations with these abusive practices. Forced labor and human trafficking involve coercion and typically reference situations in which violators take advantage of victims’ basic vulnerabilities (including poverty, isolation from protective social networks, minority status, youth, and gender). However, the terms are distinct in their legal meaning and are regulated domestically by different statutes and internationally by different conventions.

Overall, our research reveals that among Fortune 100 companies there is significant awareness and engagement with the potential relationship between their businesses and the serious abuses of human trafficking and forced labor (and, for many companies, there are notable efforts to avoid links with the trade in conflict minerals). The fact that many, although not all, of the companies researched have publicly available policies on these issues is a positive sign. This is a clear indication of a growing understanding that corporate social responsibility includes reviewing potential human rights and labor abuses within global supply chains.

Nevertheless, the specific nature and scope of Fortune 100 company policies on these issues varies significantly. For example, among those companies with policies, there are substantial differences in the types of monitoring processes used: with 21 percent using only internal monitoring, 5 percent using only external monitoring, and 68 percent using both internal and external monitoring. There are also differences in training and capacity building, with almost seven in ten (68 percent) Target Group companies expressing a commitment to providing training and capacity building for company staff, and over six in ten (61 percent) expressing a commitment to training and capacity building for supply chain vendors and

agents. And, there are distinctions in the degree to which companies provide remediation when problems are discovered, with nearly half of the Target Group companies (49 percent) providing general remediation, while only 3 percent describe systems to provide remediation to individual victims, who suffer most directly from these abuses. These figures reveal both the achievements of Fortune 100 companies as well as areas where they may improve.

Our project is based on an understanding that major companies face serious challenges when developing and implementing policies to address potential human rights abuses within their global supply chains. Workers are typically employed by multiple layers of subcontractors, so abuses may occur at a place in the supply chain several levels removed from the company that has established the policy. In addition, forced labor, human trafficking, and the trade in conflict minerals may be purposefully hidden from monitors. Gaining accurate information regarding victimized workers can be difficult, especially where this requires truthful reporting and open access to the practices of labor brokers and recruiters. Given these challenges, the growing commitment of large corporations to take action to combat these abuses is commendable and deserves ongoing support.

We decided to study publicly available policies of Fortune 100 companies as a means of understanding how major corporations address key abuses associated with global supply chains. Our research suggests that there is an emerging norm among business leaders that they have a responsibility for protecting the fundamental rights of workers involved at various levels within their companies' international economic activities. Nevertheless, it is important to note that our study does not review the efficacy of these programs nor does it provide insight into whether or not companies comply with their policies. Information on those issues is essential for an accurate assessment of corporate social responsibility and should be the subject of future research.

This report is part of an ongoing multi-year research project of the American Bar Association and Arizona State University's McCain Institute for International Leadership and the School of Politics and Global Studies as directed by Professor Daniel Rothenberg. The study establishes a baseline on major companies' positions on human trafficking, forced labor, and the trade in conflict minerals. This allows, for the first time, a comparative company and industry analysis of policies on these key human rights issues while setting the stage for tracking developments over time. Ongoing findings will be presented in future reports.

We hope that our research will encourage those companies that currently do not have policies on forced labor, human trafficking, and the trade in conflict minerals to adopt them. We also hope to encourage those

companies with policies to strengthen their commitment to preventing violations within global supply chains in a comprehensive and effective manner. Overall, we intend our research to contribute to a more just world in which vulnerable populations are provided with the greatest possible protections from abuse.

1. MAJOR CORPORATIONS, GLOBAL SUPPLY CHAINS AND HUMAN RIGHTS

In this age of rapid globalization, major corporations have increased foreign investment and international production and created complex, multi-layered supply chains. These economic links cross national borders and define intricate networks of contractors and subcontractors. While these developments have contributed to a dynamic international economy, they enable a variety of human rights violations including forced labor, human trafficking, and the trade in conflict minerals. Many companies have adopted policies that express a commitment to addressing potential abuses within their business activities and among subcontractors and related partners within their global supply chains. While major global companies are increasingly committed to a vision of corporate social responsibility that includes core human rights issues, there is currently limited data on their efforts. This makes it difficult to assess overall progress in this area.

This report addresses this issue by presenting the first ever comparative analysis of the publicly available policies of Fortune 100 companies on forced labor, human trafficking, and the trade in conflict minerals. The goal of our study is to establish a baseline on major companies' policies on key human rights violations. This can be used to assess the current state of corporate social responsibility while tracking developments over time that will be presented in the future reports. In this way, our research encourages companies to develop and implement the most complete and effective policies possible to protect vulnerable workers in the global economy. Our research may also assist socially engaged consumers, investors, and others who are increasingly interested in knowing more about the origins of the products they buy and the companies they support.

Our study focuses only on those policies that are publicly available, as defined by policies that can be found by searching corporate websites and conducting internet searches linking company names with key terms. The project focuses on Fortune 100 companies because of their size, scope, financial importance, and leadership within the global economy. The study assumes that where companies have a commitment to addressing human trafficking, forced labor, and the trade in conflict minerals, they would create corporate policies on these issues. Furthermore, the project assumes that companies with effective policies on these issues would make them publicly available to signal the company's concerns to potential supply chain partners as well as to the general public.

Clearly, corporate policies alone may not reflect actual company practice, which can only be assessed if a company discloses their activities,

especially as reviewed by outside independent experts. However, documenting available corporate policies provides a useful comparative assessment of the positions taken by global business leaders on these human rights issues. Over time, this joint ABA/ASU project will enable improved understanding of the efforts of major corporations to combat forced labor, human trafficking, and the trade in conflict minerals and encourage Fortune 100 companies and others to expand their protection of the vulnerable workers within global supply chains.

2. PROJECT STRUCTURE AND METHODOLOGY

The study was created in response to a request by the Presidential Task Force on Human Trafficking of the American Bar Association to Daniel Rothenberg, an ASU faculty member who developed and supervised this project. The initial research was conducted by a team of students who participated in Arizona State University's McCain Institute Policy Design Studio in the School of Politics and Global Studies.¹ This research was then independently verified by a second team of students from Arizona State University's Sandra Day O'Connor College of Law² with all data reviewed and re-analyzed a third time to ensure accuracy.³

The project provides a general understanding of the current state of Fortune 100 company policies on forced labor, human trafficking and the trade in conflict minerals (list of Fortune 100 companies in Appendix 1). These three human rights issues have been the subject of considerable recent debate and discussion and are directly addressed by both domestic and international law. In addition, they are abuses intimately linked with a rapidly expanding global economy and may be connected to the international supply chains of major corporations.

Our research project involved three key elements: first, developing and implementing a methodology; second, creating a database of the material gathered; and, third, preparing a comparative analysis of publicly available company policies (detailed review of the project methodology in Appendix 2). These three components are part of ongoing research to track major corporations' commitments to addressing pressing human rights issues. Our database has allowed the research teams to review individual company policies and engage in comparative analyses by industry type, Fortune 100 ranking, and other criteria.

Our methodology is based on the idea that publicly available policies are those that can be reasonably accessed using company websites

¹ The first student team included Hailey Alcaraz, Ryan Johnston, Adam Silow, and Amelie Simons. Michael Johnson provided additional research and support. The School of Politics and Global Studies is an academic unit of the College of Liberal Arts and Sciences.

² The second student team included Rachelle Jones-Rowe, Carlos Perez Rojas, Ma Khin Pyi Son, and Amber Qualls.

³ The final review was conducted by Adam Silow who linked the data sets from the first and second group to ensure accuracy and consistency. In addition, extensive edits on the text of this report were provided by Hon. Louraine Arkfeld and Linda Hayman, both members of the ABA Task Force on Human Trafficking.

and a commonly used search engine. The two project teams used keyword searches of Fortune 100 company corporate websites as well as Google-based internet searches linking the company name with a series of keywords. Both forms of internet searches were applied to all Fortune 100 companies in an identical manner to ensure that the review process was rigorous and consistent (the methodology form used for all companies can be found in Appendix 3). After the initial research was completed, secondary random company searches were conducted to test the methodology's effectiveness and accuracy. The first team's implementation of the methodology was conducted as part of a course from February through April 2013 and the second team's research was conducted from September through November 2013. The two teams came to the same conclusions, although several corporations expanded their policies between the two research periods. The final review of the data was completed in February 2014.

Our research teams downloaded all company policies found in the corporate website and search engine review. The teams then reviewed the Fortune 100 policies in relation to a series of questions designed to provide a comparative understanding of how major companies in a broad range of industries addressed potential links to forced labor, human trafficking and the trade in conflict minerals. The analysis began with a review of whether or not each company had a policy, however minimal, that responded to these violations. Where companies had policies, these were reviewed in relation to additional issues including: does the policy specifically reference domestic and/or international law and, if so, how?; does the policy include specific commitments to training and capacity building for company staff and/or supply chain partners?; does the policy include systems for reporting violations and, if so, what systems are used?; does the policy provide mechanisms of punishment and/or remediation and, if so, for which individuals and groups? (The analysis form completed for all companies can be found in Appendix 4).

As companies consider their policies, they may adjust their actions in a variety of ways. These changes may be made on the basis of shifting understandings of their commitment to corporate social responsibility and in relation to the actions of other companies and other industry leaders. Those companies whose policies are not publicly available may choose to make them widely available. Those with no current policies may choose to develop standards on these and related human rights issues. Those companies with existing policies may decide to adjust them to become more specific, focused, and protective. Or, corporations may decide to change their policies to become less protective.

Our research teams and project partners hope that this work serves to motivate Fortune 100 companies to develop the most robust, engaged,

and substantive policies possible. We seek to facilitate and inspire ongoing dialogue, debate, and research and, most importantly, to encourage major corporations to adopt policies addressing the relationship between their economic activities and supply chains and key human rights violations.

3. KEY ISSUES: FORCED LABOR, HUMAN TRAFFICKING, AND THE TRADE IN CONFLICT MINERALS

Millions of people around the world are subjected to forced labor, human trafficking, and the abuses associated with the trade in conflict minerals. These violations link repression, dominance, cruelty, and violence with the global economy. While there is no fully accurate data on the prevalence or social and economic impact of these practices, they are found in every region of the world and yield enormous benefits for violators. For example, the United Nations estimates that the profits from human trafficking alone are \$4 to \$7 billion per year.⁴

Increasingly, major companies are expanding their understanding of corporate social responsibility to develop policies to combat forced labor, human trafficking, and the trade in conflict minerals. These efforts respond to evolving understandings of good corporate citizenship as well as developments within domestic and international law. There are a number of international conventions that define prohibitions on human trafficking and forced labor, terms that are closely related, yet legally distinct.⁵ In addition, there are emerging norms and associated institutions designed to end the trade in conflict minerals.

In recent years, U.S. domestic law has evolved to address these violations as seen in the Trafficking Victim Protection Act and the anti-conflict minerals provisions of the Dodd-Frank Act. In addition, there are state laws dealing with these issues, such as the California Transparency in Supply Chains Act, as well as proposals for similar laws in other states.

⁴ Wood, M. "Human Trafficking Presents Worldwide Problem." *University of Virginia School of Law*.

www.law.virginia.edu/html/news/2001_02/trafficking.htm

⁵ "Forced labour, contemporary forms of slavery, debt bondage and human trafficking are closely related terms though not identical in a legal sense. Most situations of slavery or human trafficking are however covered by ILO's definition of forced labour." International Labor Organization, "The Meanings of Forced Labor," http://www.ilo.org/global/topics/forced-labour/news/WCMS_237569/lang--en/index.htm; and "Forced labour is any work or services which people are forced to do against their will under the threat of some form punishment. Almost all slavery practices, including trafficking in people and bonded labour, contain some element of forced labour." Anti-Slavery International, http://www.antislavery.org/english/slavery_today/forced_labour.aspx

FORCED LABOR

The International Labor Organization (ILO) defines forced labor as “situations in which the persons involved are made to work against their free will, coerced by their recruiter or employer” through exploitative and coercive means such as violence, threats, accumulated debt, or retention of identity papers.⁶ Modern forced labor can take many forms, including work under the threat of violence to laborers and their families as well as debt peonage. Forced labor is found in many industries and is often associated with local conditions of disempowerment and vulnerability, including ethnic divisions, gender discrimination, economic inequality, and institutionalized corruption.⁷

Forced labor has long been recognized as a major violation of fundamental rights and human dignity that has long been regulated by both international and domestic law. Many international human rights treaties included prohibitions on forced labor and the issue is referenced in multiple legal instruments, including the Universal Declaration of Human Rights,⁸ the International Covenant on Civil and Political Rights,⁹ the International Covenant on Economic, Social and Cultural Rights,¹⁰ the Forced Labor Convention,¹¹ and the Abolition of Forced Labor Convention.¹² In addition, domestic law in the U.S. and virtually everywhere in the world criminalizes forced labor. Many countries have specific governmental bodies responsible for addressing the issue through regulatory activities, investigations, enforcement, prosecution, and punishment. Despite its widespread prohibition, forced labor is still found throughout the world. The ILO estimates that nearly 21 million people are currently subjected to forced labor.¹³

⁶ International Labor Organization, “ILO 2012 Global Estimate of Forced Labor,” 2012, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_181921.pdf

⁷ International Labor Organization
<http://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

⁸ <http://www.un.org/en/documents/udhr/>

⁹ <http://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>

¹⁰ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx>

¹¹ http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029

¹² http://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C105

¹³ International Labor Organization, “ILO 2012 Global Estimate of Forced Labor,” 2012, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_181921.pdf

HUMAN TRAFFICKING

Human trafficking involves the recruitment, transport, or provision of people for coercive labor, including involuntary servitude or slavery. Human trafficking is often divided between sex trafficking and labor trafficking, with both activities estimated to violate the fundamental rights of millions in every region of the world. Trafficking is practiced by sophisticated criminal networks as well as informal contractors, subcontractors, and labor brokers.

The UN has documented trafficking in multiple industries including agriculture, construction, mining, textiles, industrial production, and multiple service professions including restaurants, tourism, and domestic labor.¹⁴ According to the United Nations Office on Drugs and Crime (UNODC), the international body responsible for monitoring and combating trafficking, 75 percent of trafficking victims are women and girls and 27 percent are children.¹⁵ The UNODC also found that while most countries have criminalized human trafficking, many have few if any convictions.¹⁶

Within international law, human trafficking is defined by the Protocol to Prevent, Suppress and Punish Trafficking in Persons (Trafficking in Persons Protocol) of the larger United Nations Convention Against Transnational Organized Crime (UNTOC).¹⁷ The U.S. is a party to both UNTOC and the Trafficking in Persons Protocol. The main U.S. law dealing with human trafficking is the Trafficking Victims Protection Act of 2000 and its various re-authorizations.¹⁸ These laws outline the federal government's commitment to combating human trafficking and set up a number of protective mechanisms for victims based on what is known as

¹⁴ United Nations Office on Drugs and Crime, http://www.unodc.org/unodc/en/human-trafficking/faqs.html#What_types_of_industries_are_involved_with_human_trafficking

¹⁵ "Global Report on Trafficking in Persons," United Nations Office on Drugs and Crime. 2012. http://www.unodc.org/documents/data-and-analysis/glotip/Trafficking_in_Persons_2012_web.pdf

¹⁶ Ibid.

¹⁷ United Nations Office on Drugs and Crime, <http://www.unodc.org/unodc/en/human-trafficking/what-is-human-trafficking.html>

¹⁸ The Victims of Trafficking and Violence Protection Act of 2000 (P.L. 106-386), the Trafficking Victims Protection Reauthorization Act of 2003 (H.R. 2620), the Trafficking Victims Protection Reauthorization Act of 2005 (H.R. 972), and the Trafficking Victims Protection Reauthorization Act of 2008 (H.R. 7311).

the “three Ps”: prosecution, protection, and prevention. These laws also require the federal government to assess the anti-trafficking efforts of all of the countries in the world, which are presented each year in the Trafficking in Persons (TIP) Report. This is one of the most comprehensive reviews of global anti-human trafficking efforts and signals the U.S. government’s role as a leader in the struggle to end human trafficking.¹⁹

In addition, there are some state laws which address human trafficking, such as the California Transparency in Supply Chains Act of 2010 (SB 657).²⁰ This law focuses on corporate supply chains, applies to any multinational company that conducts business in the state, and brings in more than \$100 million in gross annual receipts. The act compels companies to publicize their efforts to eradicate slavery and human trafficking from their supply chains. In addition, companies are required to post this information on their corporate websites in a manner that is easily accessible to the general public.

While human trafficking is linked with other repressive practices that have long been understood to be severe violations of fundamental rights, such as forced labor and slavery, the term was not codified internationally or domestically until 2000. In this way, human trafficking is one of the few human rights violations expressly linked with the rapid expansion of the global economy. For this and other reasons, anti-trafficking efforts are of special significance for large, internationally-integrated companies.

CONFLICT MINERALS

The term “conflict minerals” refers to the use of profits from mining to fuel political violence and conflicts that empower armed groups responsible for severe human rights violations. The term gained significance following the Kimberly Process successful regulation of “conflict diamonds” that played a central role in brutal wars in West Africa.²¹ Key conflict minerals include coltan, used for small batteries; cassiterite, used for circuit boards; wolframite, a dense metal used in many consumer electronics; and gold. Interest in many of these metals has

¹⁹ To review U.S. government Trafficking in Person (TIP) reports, See <http://www.state.gov/j/tip/rls/tiprpt/>

²⁰ http://leginfo.ca.gov/pub/09-10/bill/sen/sb_0651-0700/sb_657_bill_20100930_chaptered.html

²¹ The Kimberley Process is a joint effort of governments, industry, and civil society to “stem the flow of conflict diamonds – rough diamonds used by rebel movements to finance wars against legitimate governments.” See <http://www.kimberleyprocess.com/>

increased in recent years because of their use in cell phones, personal computers, tablets, and other electronic devices.

The issue of conflict minerals has largely focused on the situation in the Democratic Republic of the Congo (DRC) which has trillions of dollars in mineral reserves, is one of the poorest countries in the world, and has suffered over fifteen years of conflict leading to the deaths of more than 5.5 million people. Armed groups often take control of mines or tax miners using the profits they extract to fund their political and military agendas. These groups commonly exploit powerless victims through the use of threats and violence and often link economic activity with killing, rape, torture, and other crimes.

The United States, the European Union, and African countries in the region have taken steps to try to minimize the export of conflict minerals from the DRC. These mechanisms vary in terms of their legal status and regulatory demands. Most of these initiatives are based on the concepts of due diligence, certification, and traceability. The initiative gained momentum over recent years, most significantly from section 1502 of the Dodd-Frank Act, which requires due diligence from American companies sourcing minerals from the DRC.²²

The law requires all companies traded and listed on U.S. stock exchanges whose products contain coltan, cassiterite, wolframite, or gold to publicly disclose whether these minerals originate from the DRC or an adjoining country. Companies must substantiate claims that conflict minerals do not originate from this region or, in the event that they do, must include a “Conflict Minerals Report” in their annual SEC filings. The first SEC reports are due to be submitted by companies in June 2014.

²² H.R. 4173 (111th): Dodd-Frank Wall Street Reform and Consumer Protection Act. <https://www.govtrack.us/congress/bills/111/hr4173/text>

4. KEY FINDINGS

Our project reviewed all Fortune 100 companies regarding their publicly available policies on forced labor, human trafficking, and the trade in conflict minerals. Since certain industries do not rely on global supply chains and are unlikely to need these policies, we separated out those Fortune 100 companies that met this criteria based on their industry categorization as “commercial banks;” “diversified financials;” “insurance: life and health;” and “insurance: property and casualty” (terms used in the Fortune 100 list). After removing these companies from our analysis, we were left a subset of 79 companies which we have termed the “Target Group.” It is worth noting that within the Target Group there are companies that may have no potential economic link to conflict minerals (although there is no way using the industry categories of the Fortune 100 list to make this determination). For this reason our data on anti-conflict minerals policies is presented separately within the report. It is also important to note that some companies outside of the Target Group have publicly available policies on forced labor, human trafficking, and the trade in conflict minerals. For this reason, the key findings below reference numbers and percentages out of all Fortune 100 companies (100 companies), Target Group companies (79 companies), and Fortune 100 companies with publicly available policies (66 companies).

1. Fortune 100 companies have expressed a significant interest in addressing potential links to forced labor and human trafficking in their global supply chains.

Over half of all Fortune 100 companies (54 percent) have publicly available policies on forced labor and nearly two-thirds (66 percent) have policies on human trafficking. Of the Target Group companies, over three-fourths (76 percent) have publicly available policies on forced labor and two-thirds (66 percent) have policies on human trafficking.

2. Fortune 100 companies have expressed a significant interest in addressing potential links to the trade in conflict minerals, but this applies only to some companies and may be largely based on a response to new federal regulations.

Over one third (37 percent) of all Fortune 100 companies had publicly available policies addressing conflict minerals and over four in ten (43 percent) of the Target Group had such policies. The Dodd-Frank requirements for addressing potential links to conflict minerals from the Democratic Republic of the Congo are relatively new and may well influence corporate policies on these issues. It is also important to note that many large companies are involved with economic activities that do not involve minerals associated with conflicts.

3. Fortune 100 companies' policies on forced labor and human trafficking vary in substantive ways which provide guidelines for the development of best practices.

Supply chain monitoring – Virtually all Fortune 100 companies (95 percent) with publicly available policies express a commitment to ongoing supply chain monitoring, with 21 percent using internal monitoring, 5 percent using external monitoring and 68 percent using both internal and external monitoring.

Referencing international and domestic law – Around half (49 percent) of the Target Group companies reference some element of international law and/or guidelines. The most commonly referenced documents and laws are the Universal Declaration of Human Rights (35 percent), the ILO Declaration on the Fundamental Principles of Rights at Work (22 percent), and the UN Global Compact (19 percent). And nearly six in ten (58 percent) of Target Group companies reference some aspect of U.S. federal or state law. The most commonly cited laws are the California Transparency in Supply Chain Act (56 percent) and the Dodd-Frank Wall Street Reform and Consumer Protection Act (34 percent).

Training and capacity building – The publicly available policies of nearly seven in ten (68 percent) of Target Group companies express a commitment to training and capacity building for company staff on these key human rights violations and six of ten (61 percent)

express a commitment to training and capacity building for supply chain vendors and agents.

Complaint mechanisms – Of Fortune 100 companies with publicly available policies dealing with these violations, over nine out of ten (93 percent) provide a complaint mechanism, although the systems used vary widely, generally including one or more of the following: a hotline, a mode of email/internet reporting, and reporting to a supervisor or to the human resources department.

Remediation – Around half of the Target Group companies (49 percent) provide mechanism for general remediation where problems are found. Among those Fortune 100 companies with publicly available policies, nearly two-thirds (64 percent) describe general remediation mechanisms, yet only 3 percent describe systems to provide remediation to individual victims, who suffer the most from these abuses.

4. Fortune 100 companies are clearly engaged with key human rights issues, yet there is a need for more research and room for improvement.

The majority of Fortune 100 companies with global supply chains have developed policies and made them publicly available as a means of addressing forced labor, human trafficking, and the trade in conflict minerals. This suggests that there is an evolving understanding among a significant set of major corporations that addressing human rights issues within global supply chains is an important element of corporate social responsibility. Nevertheless, there is significant room for improvement. In addition, there is a need for more data and analysis as to which types of policies are most effective as part of an effort to better understand best practices in monitoring supply chains for serious human rights violations.

5. DETAILED PROJECT FINDINGS

The text and tables which follow present a detailed comparative review of Fortune 100 responses to the analysis questions as divided by three different groupings of companies:

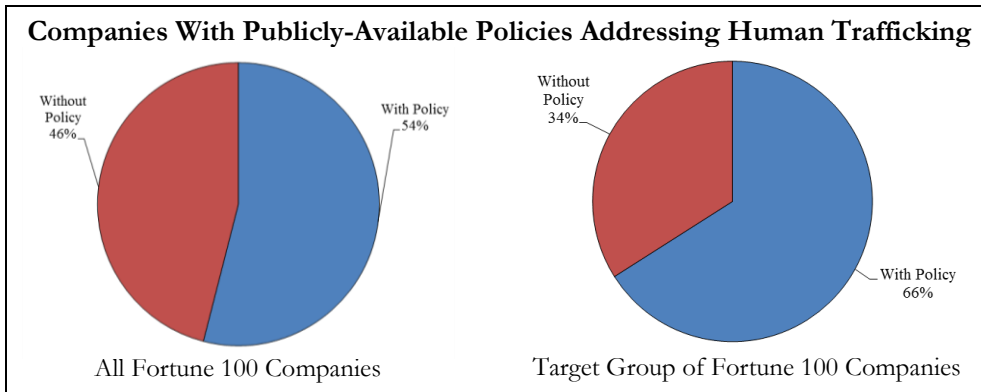
- The full set of Fortune 100 companies;
- The Target Group that comprises 79 companies (excluding certain companies based on the industry categorization); and
- Fortune 100 companies with publicly available policies dealing with one or more of the key human rights violations studied. This group represents 66 of the 100 companies and includes several companies that are not part of the Target Group.

The analysis of each of these groups contributes to a general understanding of the publicly available policies on forced labor, human trafficking, and the trade in conflict minerals for Fortune 100 companies.

Do Fortune 100 Companies policies have publicly available policies on human trafficking?

Of all Fortune 100 companies, 54 percent had policies related to human trafficking.

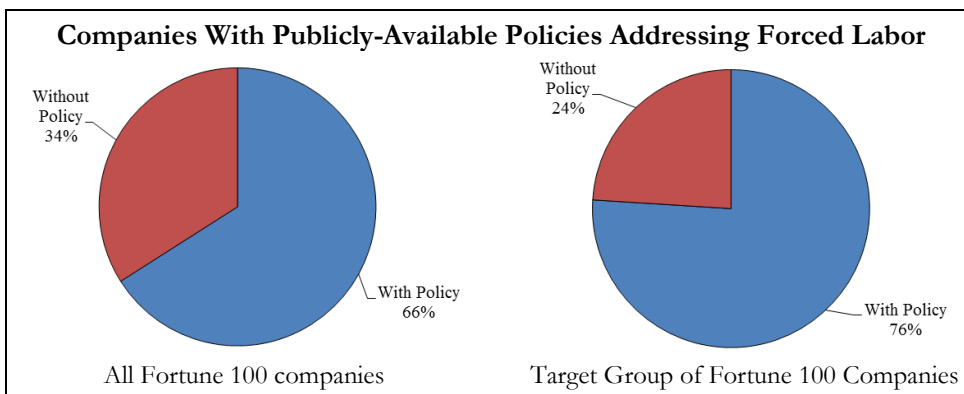
Among the Target Group companies, 66 percent had policies related to human trafficking.



Do Fortune 100 Companies have publicly available policies on forced labor?

Of all Fortune 100 companies, 66 percent had policies related to forced labor.

Among the Target Group companies, 76 percent had policies related forced labor.



Do Fortune 100 Companies policies have publicly available policies on the trade in conflict minerals?

The conflict mineral provision of the Dodd-Frank Wall Street Reform and Consumer Protection Act is a relatively new law. It has been criticized by some as potentially overbroad and possibly ineffective. The results for Conflict Minerals are being reported separately from the results for either human trafficking or forced labor. This is done in order to avoid any confusion as to meaning of the results.

Of all Fortune 100 companies, 37 percent had policies related to the trade on conflict minerals.

Among the Target Group companies, 43 percent had policies related to the trade on conflict minerals.

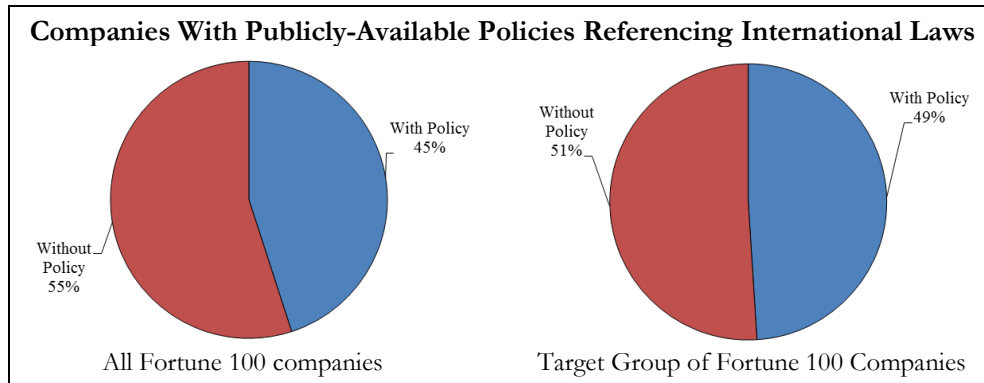
However, the Fortune 100 data does not allow for a clear means of determining which companies are involved in supply chain processes that might utilize conflict minerals.

Policies' referencing international law

Of all Fortune 100 companies, 45 percent reference some specific element of international law, such as treaties, declarations, or policy directives.

Among the Target Group companies the figure rises to 49 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 62 percent, meaning around six in ten companies with publicly available policies reference international law.



Among the Target Group companies, the most commonly referenced international legal document is the Universal Declaration of Human Rights that provides the conceptual framework for the international human rights system and was cited by 28 companies (35 percent). Also referenced are the ILO Declaration on the Fundamental Principles of Rights at Work cited by 17 companies (22 percent), the UN Global Compact cited by 15 companies (19 percent), and the UN Framework and Guiding Principles on Business and Human Rights cited by 9 companies (11 percent).

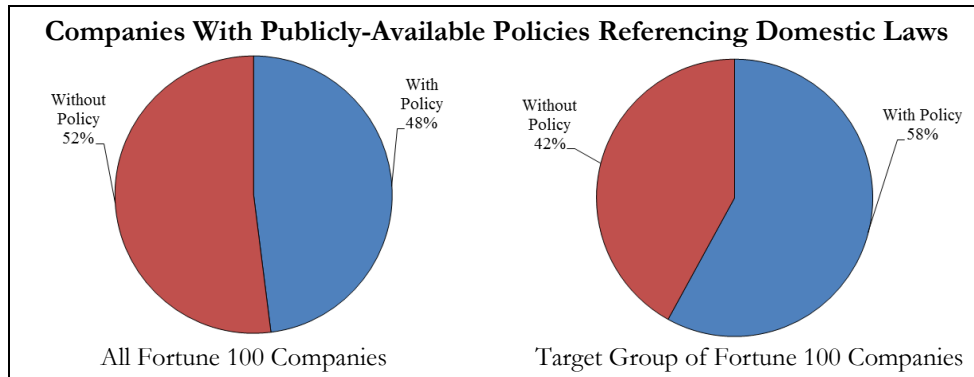
International Laws, Declarations, and Policies mentioned and percentage of Target Group referencing particular documents and instruments			
Universal Declaration of Human Rights	35 %	ILO Declaration on the Fundamental Principles of Rights at Work	22 %
UN Global Compact	19 %	UN Framework and Guiding Principles on Business and Human Rights	11 %
ILO Voluntary Principals on Security and Human Rights	6 %	Electronic Industry Coalition Citizens Code of Conduct	6 %
ILO Convention No. 138 (Child Labor)	4 %	UN Millennium Development Goals	4 %
International Covenant on Civil and Political Rights	4 %	Global Sullivan Principals	4 %

Policies' referencing domestic law

Of all Fortune 100 companies with policies on forced labor, human trafficking and the trade in conflict minerals, 48 percent reference some specific element of U.S. domestic law, whether federal law or state law.

Among the Target Group companies, the figure rises to 58 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 73 percent, meaning that nearly three of every four companies with publicly available policies reference U.S. domestic law.



While all of the Fortune 100 companies studied must comply with U.S. laws, publicly available policies on the three core human rights issues mention only some of these laws. The most commonly referenced domestic law among the Target Group is the California Transparency in Supply Chain Act, or SB 657 which is cited by 39 companies (56 percent). The second most referenced law is the Dodd-Frank Wall Street Reform and Consumer Protection Act, cited by 24 companies (34 percent).

U.S. federal and state laws mentioned and percentage of Target Group referencing particular laws			
California Transparency in Supply Chains Act	56 %	Dodd-Frank Wall Street Reform and Consumer Protection Act	34 %
U.S. Federal Acquisitions Requirement Clause 52.222-50 (to combat human trafficking)	4 %	U.S. Fair Labor Standards Act	3 %

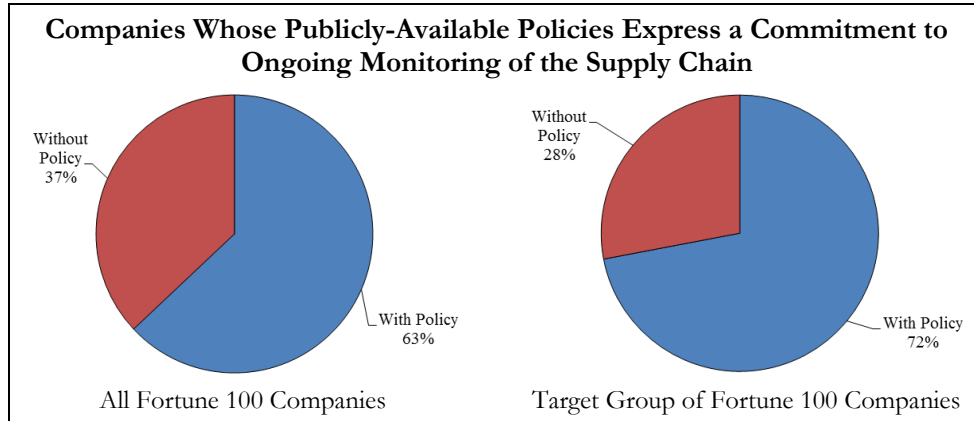
Do policies express a commitment to supply chain monitoring?

Of all Fortune 100 companies, 63 percent express a commitment to ongoing monitoring of their supply chain as regards forced labor, human trafficking, and/or the trade in conflict minerals.

Among the Target Group companies, the figure rises to 72 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 95 percent, meaning that virtually

all of the companies with publicly available policies express a commitment to ongoing supply chain monitoring.



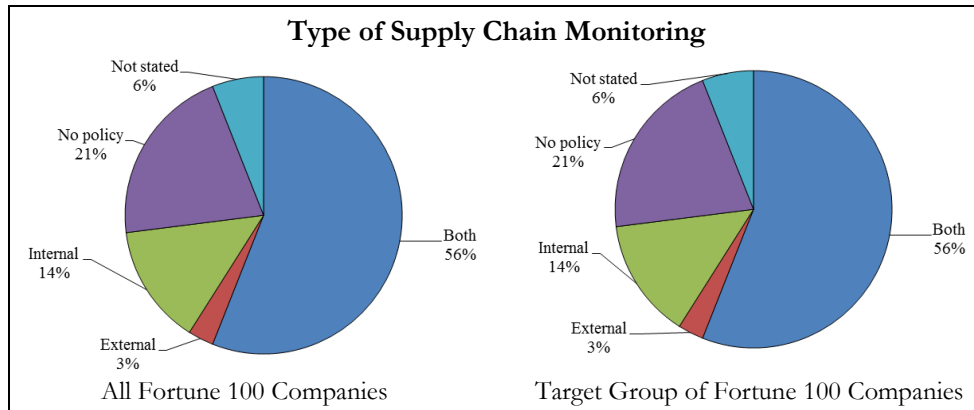
If there is supply chain monitoring, what type is used?

There are many ways for a company to engage in supply chain monitoring. Among the Target Group, the research team identified which companies reported using their own corporate team, contracting a third party auditing firm, or using a combination of these methods to monitor or audit their supply chain. In general, reliance on independent third party monitoring, solely or in conjunction with internal reviews, is viewed as more objective. In many instances, the dual internal/external reviews involved companies' reliance on their own specialized team to audit the supply chain, coupled with contracting to outside firms for work in locations that were difficult to access or under time constraints.

Of all Fortune 100 companies, 14 percent use internal monitoring, 3 percent use external monitoring and 45 percent use both.

Among the Target Group companies the figures are 14 percent use internal monitoring, 3 percent use external monitoring and 56 percent use both.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, 21 percent use internal monitoring, 5 percent use external monitoring and 68 percent use both.



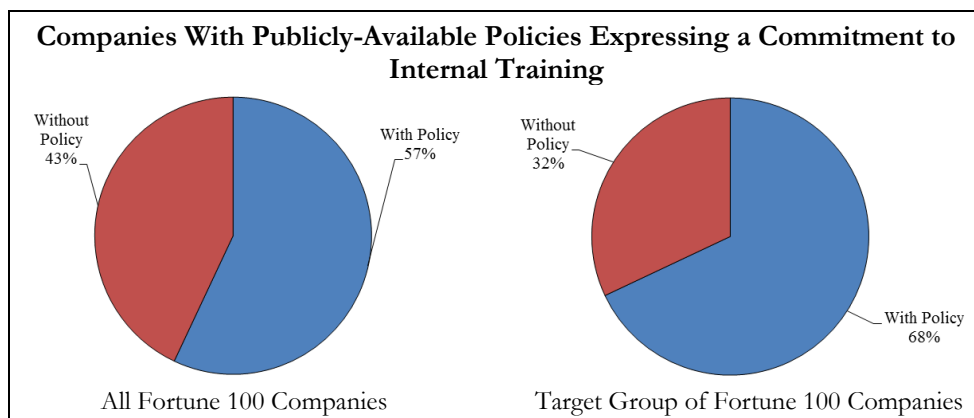
Do policies express a commitment to training and capacity building of company staff regarding supply chain monitoring?

Training and capacity building represents a key means through which companies can educate their employees as well as contractors and sub-contractors regarding these core human rights issues.

Of all Fortune 100 companies, 57 percent express a commitment to company staff training and capacity building as regards forced labor, human trafficking and/or the trade in conflict minerals.

Among the Target Group companies the figure rises to 68 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 86 percent of all major companies with publicly available policies express a commitment to training and capacity building of company staff.



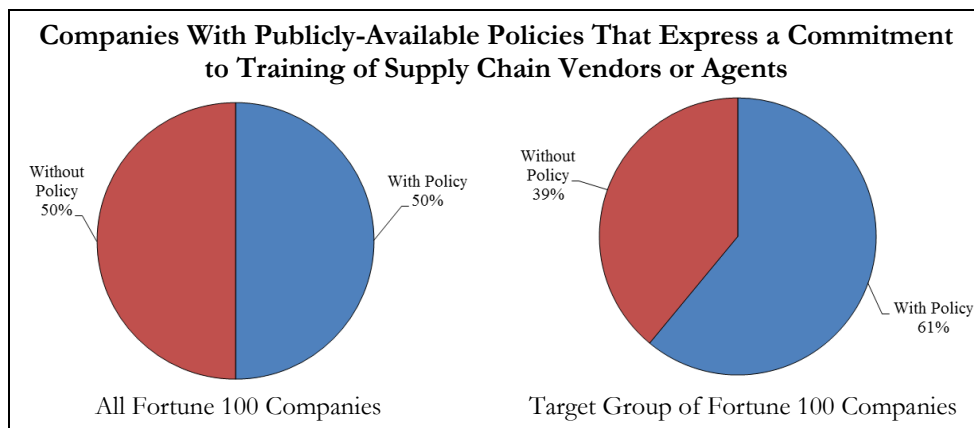
Do policies express a commitment to training and capacity building of supply chain vendors and agents?

While training and capacity building for company employees is essential, related efforts for supply chain vendors and/or supply chain agents are an important way to prevent these violations.

Of all Fortune 100 companies, 50 percent express a commitment to training and capacity building for supply chain vendors and/or supply chain agents regarding forced labor, human trafficking and/or the trade in conflict minerals.

Among the Target Group companies the figure rises to 61 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 76 percent, meaning that about three out of every four companies with publicly available policies express a commitment to training and capacity building for supply chain vendors and agents.



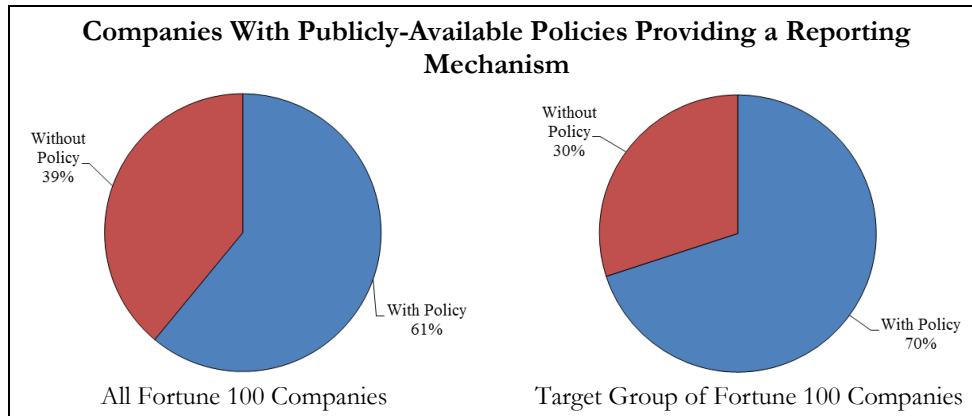
Do policies provide a mechanism to report alleged violations?

Another important aspect of the analysis is the number of companies that provide mechanisms to report allegation of violations. These include hotlines, whistleblower policies and others means of enabling employees to report allegations of violations.

Of all Fortune 100 companies, 61 percent provide a mechanism of reporting alleged violations, such as a hotline, website, whistleblower policy, etc.

Among the Target Group companies the figure rises to 70 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 93 percent, meaning that over nine out of every ten major companies with publicly available policies provide a complaint mechanism.



If there is a reporting mechanism for alleged violations, what system is used?

In order to continue to uphold the standards and expectations that companies place on their suppliers between audits, whistleblower mechanisms were put into place by some companies. The most common policy is a hotline. Other policies include an anonymous email or website for filing complaints and the suggestion that workers and others bring their concerns directly to their supervisor or to the Human Resources department. Company policies often reference multiple systems in use at the same time.

Of the 61 (61 percent) of Fortune 100 companies with policies outlining a complaint system: 6 percent use a hotline only, 1 percent use an email/internet complaint system only, 21 percent use both a hotline and email/internet complaint system; 6 percent use a hotline and reporting to a supervisor or human resources department; 1 percent use an email/internet complaint system and reporting to a supervisor or human resources department; and 26 percent use all three mechanisms (hotline, email/internet and reporting to supervisor or human resources department).

Among the 55 (70 percent) of Target Group companies with policies outlining a complaint system the figures are: 8 percent use a hotline only, 2 percent use an email/internet complaint system only, 23 percent use both a hotline and email/internet complaint system; 5 percent use a hotline and reporting to a supervisor or human resources department; 1 percent use an email/internet complaint system and reporting to a supervisor or human resources department; and 32 percent use all three mechanisms (hotline, email/internet and reporting to supervisor or human resources department).

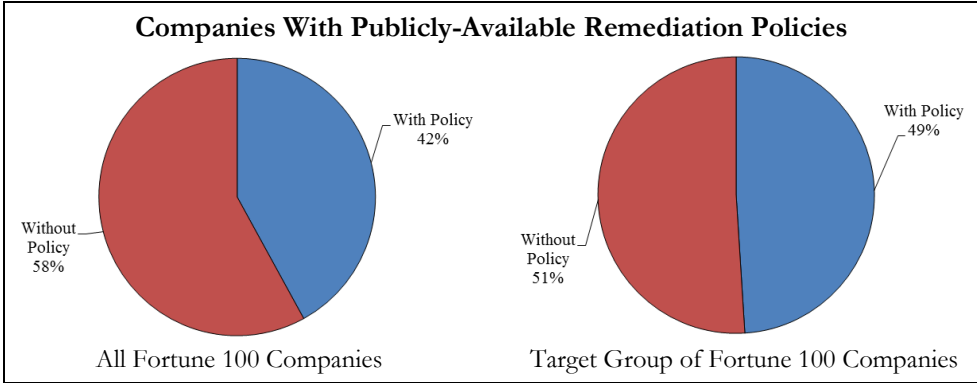
Of the 66 Fortune 100 companies with a policy dealing with one or more of these violations, 61 (92 percent) have a complaint system in which: 9 percent use a hotline only, 2 percent use an email/internet complaint system only, 32 percent use both a hotline and email/internet complaint system; 9 percent use a hotline and reporting to a supervisor or human resources department; 2 percent use an email/internet complaint system and reporting to a supervisor or human resources department; and 39 percent use all three mechanisms (hotline, email/internet and reporting to supervisor or human resources department).

Do policies provide for general remediation where problems, violations and/or abuses are found?

Of all Fortune 100 companies, 42 percent provide for general remediation where forced labor, human trafficking and/or the trade in conflict minerals is found.

Among the Target Group companies the figure rises to 49 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 64 percent, meaning that about two out of every three companies with publicly available policies provides for general remediation.



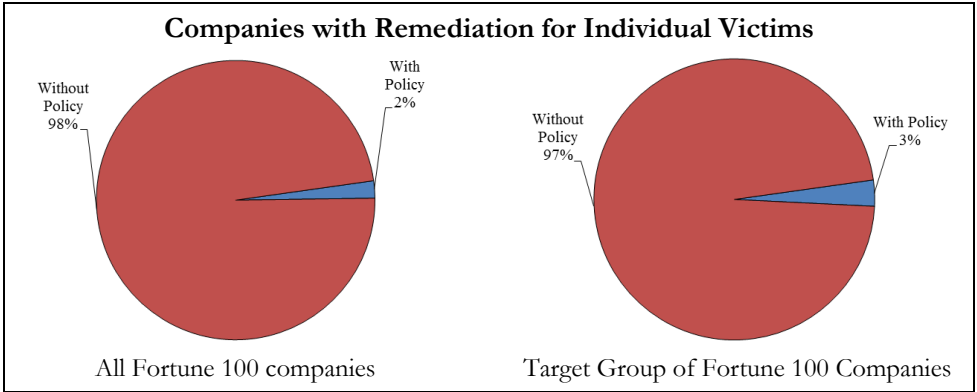
Do policies provide for individual remediation to assist specific victims where problems, violations and/or abuses are found?

Remediation for victims may involve providing compensation, creating programs to offset harm and otherwise addressing victims’ needs.

Of all Fortune 100 companies, 2 percent provide for individual remediation for victims where forced labor, human trafficking and/or the trade in conflict minerals is found.

Among the Target Group companies the figure rises to 3 percent.

Of the group of all Fortune 100 companies with a policy dealing with one or more of these violations, the figure is 3 percent.



APPENDIX 1 – FORTUNE 100 LIST OF COMPANIES

Fortune 100 Companies 2012

Rank ▼	Company	Revenues (\$ millions)	Profits (\$ millions)
1	Exxon Mobil	452,926.0	41,060.0
2	Wal-Mart Stores	446,950.0	15,699.0
3	Chevron	245,621.0	26,895.0
4	ConocoPhillips	237,272.0	12,436.0
5	General Motors	150,276.0	9,190.0
6	General Electric	147,616.0	14,151.0
7	Berkshire Hathaway	143,688.0	10,254.0
8	Fannie Mae	137,451.0	-16,855.0
9	Ford Motor	136,264.0	20,213.0
10	Hewlett-Packard	127,245.0	7,074.0
11	AT&T	126,723.0	3,944.0
12	Valero Energy	125,095.0	2,090.0
13	Bank of America Corp.	115,074.0	1,446.0
14	McKesson	112,084.0	1,202.0
15	Verizon Communications	110,875.0	2,404.0
16	J.P. Morgan Chase & Co.	110,838.0	18,976.0
17	Apple	108,249.0	25,922.0
18	CVS Caremark	107,750.0	3,461.0
19	International Business Machines	106,916.0	15,855.0
20	Citigroup	102,939.0	11,067.0
21	Cardinal Health	102,644.2	959.0
22	UnitedHealth Group	101,862.0	5,142.0
23	Kroger	90,374.0	602.0
24	Costco Wholesale	88,915.0	1,462.0
25	Freddie Mac	88,262.0	-5,266.0
26	Wells Fargo	87,597.0	15,869.0
27	Procter & Gamble	82,559.0	11,797.0
28	Archer Daniels Midland	80,676.0	2,036.0
29	AmerisourceBergen	80,217.6	706.6
30	INTL FCStone	75,497.6	37.3
31	Marathon Petroleum	73,645.0	2,389.0
32	Walgreen	72,184.0	2,714.0
33	American International Group	71,730.0	17,798.0
34	MetLife	70,641.0	6,981.0
35	Home Depot	70,395.0	3,883.0
36	Medco Health Solutions	70,063.3	1,455.7
37	Microsoft	69,943.0	23,150.0

Rank ▼	Company	Revenues (\$ millions)	Profits (\$ millions)
38	Target	69,865.0	2,929.0
39	Boeing	68,735.0	4,018.0
40	Pfizer	67,932.0	10,009.0
41	PepsiCo	66,504.0	6,443.0
42	Johnson & Johnson	65,030.0	9,672.0
43	State Farm Insurance Cos.	64,305.1	845.0
44	Dell	62,071.0	3,492.0
45	WellPoint	60,710.7	2,646.7
46	Caterpillar	60,138.0	4,928.0
47	Dow Chemical	59,985.0	2,742.0
48	United Technologies	58,190.0	4,979.0
49	Comcast	55,842.0	4,160.0
50	Kraft Foods	54,365.0	3,527.0
51	Intel	53,999.0	12,942.0
52	United Parcel Service	53,105.0	3,804.0
53	Best Buy	50,272.0	1,277.0
54	Lowe's	50,208.0	1,839.0
55	Prudential Financial	49,045.0	3,666.0
56	Amazon.com	48,077.0	631.0
57	Merck	48,047.0	6,272.0
58	Lockheed Martin	46,692.0	2,655.0
59	Coca-Cola	46,542.0	8,572.0
60	Express Scripts Holding	46,128.3	1,275.8
61	Sunoco	45,765.0	-1,684.0
62	Enterprise Products Partners	44,313.0	2,046.9
63	Safeway	43,630.2	516.7
64	Cisco Systems	43,218.0	6,490.0
65	Sears Holdings	41,567.0	-3,140.0
66	Walt Disney	40,893.0	4,807.0
67	Johnson Controls	40,833.0	1,624.0
68	Morgan Stanley	39,376.0	4,110.0
69	Sysco	39,323.5	1,152.0
70	FedEx	39,304.0	1,452.0
71	Abbott Laboratories	38,851.3	4,728.4
72	DuPont	38,719.0	3,474.0
73	Google	37,905.0	9,737.0
74	Hess	37,871.0	1,703.0
75	Supervalu	37,534.0	-1,510.0
76	United Continental Holdings	37,110.0	840.0
77	Honeywell International	37,059.0	2,067.0
78	CHS	36,915.8	961.4

Rank ▼	Company	Revenues (\$ millions)	Profits (\$ millions)
79	Humana	36,832.0	1,419.0
80	Goldman Sachs Group	36,793.0	4,442.0
81	Ingram Micro	36,328.7	244.2
82	Oracle	35,622.0	8,547.0
83	Delta Air Lines	35,115.0	854.0
84	Liberty Mutual Insurance Group	34,671.0	365.0
85	World Fuel Services	34,622.9	194.0
86	New York Life Insurance	34,393.5	557.3
87	Plains All American Pipeline	34,275.0	966.0
88	TIAA-CREF	34,079.0	2,388.4
89	Aetna	33,779.8	1,985.7
90	Sprint Nextel	33,679.0	-2,890.0
91	News Corp.	33,405.0	2,739.0
92	General Dynamics	32,677.0	2,526.0
93	Allstate	32,654.0	788.0
94	HCA Holdings	32,506.0	2,465.0
95	American Express	32,282.0	4,935.0
96	Tyson Foods	32,266.0	750.0
97	Deere	32,012.5	2,799.9
98	Murphy Oil	31,446.3	872.7
99	Philip Morris International	31,097.0	8,591.0
100	Nationwide	30,697.8	-793.1

http://money.cnn.com/magazines/fortune/fortune500/2012/full_list/

APPENDIX 2 – PROJECT METHODOLOGY

Project Methodology for Collecting Company Policies and Verifying Accuracy

This project was developed in the Spring 2013 semester and completed in the Fall 2013 semester at Arizona State University. The research methodology was developed jointly by the student team working with their professor to create a rigorous and efficient mechanism of collecting and analyzing publicly available Fortune 100 company policies on human trafficking, forced labor, and the trade in conflict minerals. The methodology was based on the research teams' trial and error experimentation to develop a system that followed a step-by-step research process that can be repeated by other students and investigators to continue monitoring of Fortune 100 company policies and expand the project to cover additional companies (including possibly the Fortune 500 list). The research was conducted a second time several months after the initial process to ensure accuracy.

The project methodology is premised on the idea that significant Fortune 100 company policies on human trafficking, forced labor and the trade in conflict minerals should be publicly accessible and that any policy that is publicly accessible should be able to be identified using reasonable system of internet searching. The methodology used is, then, based on the principle that a publicly accessible Fortune 100 policy is one that is reasonably accessible through a rational and consistent internet search. The methodology involved a three stage internet search process coupled with the collection of all policies in digital form (such as Word documents or PDFs) in a centralized location.

Each member of the student team was assigned twenty-five of the 100 companies. Each researcher would mark what she/he found on a specially designed search form. They saved any relevant policies found in a folder under the company name for subsequent analysis.

- 1) *Research company websites using existing tabs* – In the first phase of the internet search portion of the research methodology, each researcher would review the official company websites of each of the Fortune 100 companies. For companies with consumer oriented websites it was sometimes necessary to find a distinct corporate website. Once the correct website was found, the researcher would follow all tabs, looking for policies within 5 clicks from home page.
- 2) *Research company websites using search function and keywords* – The second phase of the internet search portion of the research involved

searching the official corporate website using a list of thirteen search terms that were developed through group discussion and preliminary internet search testing. These terms were designed to yield relevant company policies in the results and include: trafficking; forced labor (or forced labour); slavery; conflict minerals; human rights; supply chain transparency; supply chain ethics; extractive transparency; Dodd-Frank; International Labor Organization (ILO or International Labour Organization); Fair Labor Association (FLA); California Transparency (CTSCA); and, Congo. The team limited the query to the top ten results of the search. In order to avoid wasting time scrolling through pages of irrelevant search results, the team determined that a limit needed to be set. The relevant results of initial searches pointed to the commonality that key policies were almost always found within the first ten results.

- 3) *Google search of company name and keywords* – The third phase of the internet search a general Google web search. Once again, each team member individually searched his or her portion of the Fortune 100 company websites for the thirteen keywords. The team used the following input formula to narrow the Google Internet search to each specific company: “*company name + (keyword)*.” As with the query using the search bar on the company websites, the team again looked only at the first ten results for relevant policies.

The methodology was ultimately designed to represent a reasonably exhaustive search, including thirteen search terms on both a company website’s search bar, as well as through Google.

Testing the internet search and document collection process – To test the accuracy of the methodology and research, the project used two systems.

- 1) *Initial random sample verification* – A random sample of the Fortune 100 companies reviewed by each researcher were reviewed by another team member who repeated the methodology to ensure that the research process was both consistent and comprehensive. The team determined that the phase one methodology creates uniformity, as the findings remained the same for each researcher.
- 2) *Full review of all Fortune 100 company research* – Finally, several months later, all of the research was conducted by a separate team of four law students as a means of ensuring research accuracy and to update policies.

APPENDIX 3 – PROJECT RESEARCH FORM

ASU/ABA PROJECT ON FORTUNE 100 COMPANIES POLICES ON
TRAFFICKING, FORCED LABOR AND CONFLICT MINERALS
RESEARCH FORM

Researcher

Date of research (month and year)

Company Name (use the name from the Fortune 100 list)

Company website URL (not the commercial website for companies like Apple, CVS, Ford, etc. that have a website for consumers)

1. Company website tab search – Go to the corporate website, follow tabs, looking for policies within 5 clicks from home page and mark what you found below using “nothing relevant” if you found nothing and “see ___” (listing the correct designation, such as “1a” or “2c”, etc.) for any document previously found
 - a.
 - b.

2. Company website keyword search – Search the corporate website using all of the keywords found below and mark what you found below using “nothing relevant” if you found nothing and “see ___” (listing the correct designation, such as “1a” or “2c”, etc.) for any document previously found
 - a. trafficking
 - b. forced labor (or forced labour)
 - c. slavery
 - d. conflict minerals
 - e. human rights

- f. supply chain transparency
 -
- g. supply chain ethics
 -
- h. extractive transparency
 -
- i. Dodd-Frank
 -
- j. International Labor Organization (ILO; International Labour Organization)
 -
- k. Fair Labor Association (FLA)
 -
- l. California Transparency (CTSCA)
 -
- m. Congo
 -

3. Google keyword search – Google the corporation name using all of the keywords found below and mark what you found below the keyword using “nothing relevant” if you found nothing

- a. trafficking
 -
- b. forced labor (or forced labour)
 -
- c. slavery
 -
- d. conflict minerals
 -
- e. human rights
 -
- f. supply chain transparency
 -
- g. supply chain ethics
 -
- h. extractive transparency
 -
- i. Dodd-Frank
 -
- j. International Labor Organization (ILO; International Labour Organization)
 -

- k. Fair Labor Association (FLA)
 -
- l. California Transparency for California Transparency in Supply Chains Act (CTSCA)
 -
- m. Congo
 -

4. Notes – Please write down below any notes on problems with the methodology as related to the specific company and/or any comments, thoughts or ideas related to the specific company that are relevant to the project

-
-
-

APPENDIX 4 – PROJECT ANALYSIS FORM

Methodology – Basic analysis of Fortune 100 companies’ policies

Please note that for questions asking about the specific content of policies, the answers will be based on searching one page above and one page below where any of the key terms (human trafficking, forced labor, conflict minerals and Congo) are found in the company policies reviewed.

Fields/Questions

- 1) Fortune 100 ranking
- 2) Company name
2A Forbes Industry Designation
- 3) Website(s)
- 4) Revenue
- 5) Profits
- 6) Any company policies related to “human trafficking” on the website?
Yes/No
- 7) Any company policies related to “forced labor” on the website?
Yes/No
- 8) Any company policies related to “conflict minerals” on the website?
Yes/No
- 9) Any company policies related to “Congo” on the website?
Yes/No

10) Do the company policies reference specific international law(s), declarations and/or policies related to human trafficking, forced labor and/or conflict minerals?

Yes/No

11) If yes to 10, list the law(s), declarations and/or policies

(Ex: Universal Declaration of Human Rights)

12) Do the company policies reference specific domestic law(s) related to human trafficking, forced labor and/or conflict minerals?

Yes/No

13) If yes to 12, list the law(s)

(Ex: California Transparency in Supply Chains Act)

14) Do the company policies express a commitment to ongoing monitoring of the supply chain in relation to human trafficking, forced labor and/or conflict minerals?

Yes/No

15) If yes to 14, is the monitoring process internal (a company team), external (by an independent third party monitor), both internal and external, or not stated?

Internal/External/Both internal and external/Not stated

16) Do the company policies express a commitment to training and/or capacity building of *company staff* in relation to the supply chain regarding human trafficking, forced labor and/or conflict minerals?

Yes/No

17) If yes, please describe any key aspects and/or specifics about the training and/or capacity building of *company staff* outlined in the policies.

18) Do the company policies express a commitment to training and/or capacity building of *supply chain vendors and/or supply chain agents* regarding human trafficking, forced labor and/or conflict minerals?

Yes/No

19) If yes, please describe any key aspects and/or specifics about the training and/or capacity building of *supply chain vendors and/or supply chain agents* outlined in the policies.

20) Do the company policies provide a mechanism (hotline, whistleblower policy, etc.) that allows *company staff* to present complaints regarding human trafficking, forced labor and/or conflict minerals?

Yes/No

21) If yes, please describe any key aspects and/or specifics about the mechanisms (hotline, whistleblower policy, etc.) that allow *company staff* to present complaints outlined in the policies.

22) Do the company policies provide for remediation for *individual victims* in relation to human trafficking, forced labor and/or conflict minerals?

Yes/No

23) If yes, please describe any key aspects and/or specifics about the remediation for *individual victims* outlined in the policies.

24) Do the company policies provide for remediation for *general and/or systematic problems* in relation to human trafficking, forced labor and/or conflict minerals?

Yes/No

25) If yes, please describe any key aspects and/or specifics about the remediation for *general and/or systematic problems* outlined in the policies.

26) Notes

(Please use this section to present any notes, ideas and/or observations about the analysis of the company policies that seem important for the project but are not covered by the prior questions.)