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Company report review

ABN AMRO

Sustainability Report 2005

Presented by: the Ethical Insight team at Maplecroft

## Contents

1	Company background .....	3
2	Reporting practices .....	3
2.1	Materiality .....	3
2.2	Transparency .....	3
2.3	Comparability .....	4
2.4	Assurance and verification .....	4
3	Management structure .....	5
4	Certification .....	5
5	Review of core issues .....	6
5.1	Business selection and approval .....	6
5.1.1	Position .....	6
5.1.2	Programme .....	6
5.1.3	Performance .....	6
5.2	Employees .....	7
5.2.1	Position .....	7
5.2.2	Programme .....	7
5.2.3	Performance .....	8
5.3	Community investment .....	8
5.3.1	Position .....	8
5.3.2	Programme .....	8
5.3.3	Performance .....	8
6	Ethical Insight's comment .....	9
7	Appendices .....	10
7.1	Maplecroft's Ethical Insight report review criteria .....	10
7.2	Previous Ethical Insight report reviews .....	11
7.3	Ethical Insight's sustainability reporting services .....	12

### Note

This review is based on information contained in the PDF download version of ABN AMRO's [Sustainability Report 2005](#). This review is intended as a summary only and does not provide full and complete discussion of all the issues contained in the report.

## 1 Company background

Headquartered in the Netherlands, ABN AMRO is an international bank employing some 97,000 staff in over 3,500 branches in 58 countries (listed in the report). With roots dating back to 1824, ABN AMRO is today ranked 11th in Europe and 23rd in the world based on tier 1 capital, with total assets of €881 billion (as at 31 December 2005). The bank is structured around ten business units, each responsible for managing a specific region, a distinct client segment or a product segment.

The present report is ABN AMRO's third group-wide Sustainability Report and shows much improvement on the first report, reviewed by Maplecroft in November 2004 (available at <http://www.maplecroft.net>). From the second report onwards, ABN AMRO has been publishing its Sustainability Report at the same time as the Annual Report. This is a positive move towards enabling the full range of stakeholders to gain a more complete picture of the business, although further progress could be made in using the Sustainability Report to inform and engage stakeholders and drive performance. (ABN AMRO will hopefully provide further evidence of this in future reports.) The inclusion in the Annual Report of a discrete section on the bank's approach to sustainable development can be seen as the clearest indication of its commitment. Both reports affirm the bank's intention, 'to intensify and accelerate our sustainable development efforts by integrating the sustainable development business agenda more closely into all our business activities.'

As is detailed below, ABN AMRO clearly merits its reputation as a leading light of sustainable development in the banking sector.

## 2 Reporting practices

### 2.1 Materiality

The report appropriately addresses the main material issues from a sustainability perspective with a commendable focus on efforts to integrate sustainability management into mainstream business processes. The bank has clearly benefited from a structured feedback process initiated following its previous report, and extensive stakeholder engagement (a list of the number and focus of engagements with NGOs is included in the report). Following an investigation of the 'value case' for sustainable development conducted in 2005, ABN AMRO is able to articulate clearly the importance of this issue from the bank's perspective in both its Annual and Sustainability Reports. Future reports may also benefit from employee feedback on the report, which could easily be gathered as part of the Employee Engagement Survey.

Corporate governance and the sustainability management structure are covered in detail. The main body of the report is based on six key areas of relevance to the bank's impact on sustainable development, namely: being accountable and transparent; protecting assets (applying sustainability risk management processes to new business transactions); providing responsible financial services; being an employer of choice; minimising impact on the environment; and supporting local communities. In addition to sections on these cross-cutting themes, the report includes dedicated sections on the role, actions and ambitions of each business unit regarding sustainable development issues, demonstrating the integration of sustainability behaviours into the core business.

The report shows an improvement on the previous year in setting out the bank's long term vision in each of the focus areas, as well as more detailed discussion of developments during the reporting year. Further, the report includes a series of case studies of current dilemmas, that is, proposed business projects with social, environmental or ethical implications. The case studies offer a fascinating insight into the bank's approach to often complex issues with potential trade-offs. Examples include an opportunity to participate in public flotations of internet gambling companies; and a request to finance the construction of a palm oil based biomass electricity generation plant. ABN AMRO is encouraged to continue developing and up-dating such case studies on its website and in future reports.

### 2.2 Transparency

ABN AMRO's report demonstrates a strong commitment to transparency which establishes credibility and makes for a satisfying and engaging read. As previously indicated, the series of case studies on business dilemmas is a good way of providing insight into the bank's approach to often complex issues. The report is

rigorous in supporting points made in the text with quantitative data. For example, the report discloses the exact number of staff in group functions relevant to corporate responsibility and receiving sustainability training, the results of a new Employee Engagement Survey and the number of NGOs the bank engaged with by topic during the reporting year. Perhaps most importantly, the report provides quantitative information on the number of business transactions subjected to sustainability risk management processes. ABN AMRO sets an example to other signatories of the Equator Principles in disclosing the nature of projects on which assessment were carried out (by project category, sector, capital cost and location) and the number declined as well as approved, thus providing some indication of the Principles' impact.

Crucially, the report does not shy away from compliance-related issues. ABN AMRO admits that it faced some difficult compliance issues during the year, in one instance resulting in a penalty of \$80 million and in a second of \$16.5 million. It is a pity that the details of the nature of the bank's responsibility are explained in only vague terms. However, that the members of the Managing Board have taken personal responsibility for the violations is perhaps the best possible indication of the sincerity of its purported commitment to ethical behaviour. Indeed, embedding a culture of compliance must begin at the top. Specifically, the Managing Board has agreed to pay back €1 million collectively out of the 2004 bonuses, accounting for a significant share of each member's bonus – 40% of the Chairman's bonus, 30% of the Chief Financial Officer and 20% of the remaining four Board members.

In early 2006, ABN AMRO re-launched an improved whistle-blowing policy, including the introduction of special telephone lines in all regions and secure email addresses. In future reports, the bank is encouraged to provide information on the number and nature of concerns recorded in future, and corrective action taken.

The report also includes more detailed disclosure on corporate lobbying activities than most, highlighting three issues the bank has recently argued in favour of. In future reports, ABN AMRO should disclose all issues relevant to its social, ethical or environmental aspects on which it has attempted to influence government during the reporting year.

## 2.3 Comparability

ABN AMRO's 2005 Sustainability Report is compiled in accordance with the Global Reporting Initiative (GRI) 2002 Guidelines, the most widely used international reporting standard. Importantly, it also reports in accordance with the financial services sector supplement – an index is included in the report, and a comprehensive overview of how the bank registered and met the GRI requirements is available on-line.

In many instances, the report helpfully assimilates key information. For example, an overview of key facts and figures is presented at the beginning of the report, with data provided over multiple years to allow comparison over time. Similarly, the report includes tables of the major awards and achievements received during the reporting year, the bank's rating on the various sustainability indices compared to the previous year, and the bank's sustainability-related partnerships and their main purpose.

In each of the six focus areas, as well as for each business unit, the report reviews the main actions for the reporting year and ambitions for 2006. This allows the reader to compare what has been achieved against previous objectives, and track changes in direction. In many cases, targets could be more specific. In future reports, ABN AMRO is encouraged to present time-bound targets in the short- and medium term, and related actions. Key performance indicators have been identified in some areas, such as gender diversity, and could be more comprehensive and clearly presented.

## 2.4 Assurance and verification

In line with good practice, the report is independently assured by a specialist third party, Ernst & Young Accountants. A 'reasonable' – or positive – level of assurance was provided for the best part of the report, and a 'moderate' level of assurance for some parts, namely data related to absentee rates, environmental performance and CO<sub>2</sub> emissions, as well as ambitions and action plans for 2006. Obtaining a reasonable level of assurance provides for a high level of credibility, as it positively establishes that data contained in the report are accurate and adequate.

In the previous reporting year, ABN AMRO solicited structured feedback on its sustainability report from staff, SRI fund managers, NGOs, consultants, peers and academics. Possible areas for improvement identified by this process are highlighted in the report and do appear to have been addressed, although it is not clear as to whether the list of recommendations is exhaustive. As a next step, ABN AMRO is encouraged to consider

how to use the report as a means of engaging and informing internal and external stakeholders about the bank's activities and further driving performance.

### 3 Management structure

High level commitment to sustainable development is reflected in ABN AMRO's management structure which appears designed to facilitate the integration of sustainability management into the core business. At the group level, the Sustainable Development department is part of the Group Risk Management Organisation, which provides a clear indication that sustainability issues are integrated in the company's core operations. A dedicated Sustainable Business Advisory team assesses and advises on the appropriate management of environmental, social and ethical (ESE) risk issues.

Dedicated resources and teams headed by a Sustainable Development Leader have been established not only for the group as a whole but also within each Business Unit in order to help line management to implement sustainability initiatives and raise awareness. All Sustainable Development Leaders also participate in a group-wide Sustainable Development Value Team whose role is to act on strategic sustainability topics. There is sadly no indication in the report of the role of such group-wide teams in sharing lessons learned across such a geographically diverse business, or the number and focus of meetings held during the reporting year.

### 4 Certification

ABN AMRO received some noteworthy awards in 2005, including most transparent in sustainability reporting according to the Dutch Ministry of Economic Affairs and being a leading bank in the Equator Principles initiative, according to the International Association of Impact Assessment.

ABN AMRO performs extremely well in the various sustainability indices. In both 2004 and 2005 it led the banking sector in the Dow Jones Sustainability Index (STOXX) and was second in the DJSI World. The company is included in the FTSE4Good and the Climate Leadership Index, and received an AAA rating by Innovest.

Finally, ABN AMRO participates in a number of sustainability-related partnerships, including the UN Global Compact, Equator Principles, UNEP-FI, Carbon Disclosure Project and Prince of Wales Business and the Environment Programme, displaying commitment to the development and sharing of best practice principles.

## 5 Review of core issues

### 5.1 Business selection and approval

#### 5.1.1 Position

There is evidence in the report of a raft of screening and information tools used by the Sustainable Business Advisory team in the assessment of sustainability risk of new transactions. In line with good practice, ABN AMRO has developed environmental, social and ethical (ESE) policies in consultation with stakeholders, many of them sector-specific (most recently on gambling and dams). The bank is also a signatory of the Equator Principles and can be commended for the leading role it is attempting to play in seeking ways to engage with other banks on areas beyond the Principles' minimum requirements, including initiatives on transparency and disclosure and implementation for transactions below \$50 million.

#### 5.1.2 Programme

Sustainability risk management procedures are clearly in place. Client-facing staff have guidance, in the form of an ESE risk filter, to assist them in identifying potentially high risk transactions. The task of assessing ESE risk rests with the dedicated Sustainable Business Advisory department.

Most promisingly, there is evidence that further steps are being taken to embed sustainability decision-making across the bank. Having started with client lending activities, ABN AMRO decided in 2005 to extend sustainability risk assessment to corporate finance, mergers and acquisitions and equity capital markets engagements.

In future reports, ABN AMRO is encouraged to discuss its role in sharing lessons learned across the banking sector regarding the integration of sustainability risk management into core business activities.

#### 5.1.3 Performance

As a result of the management systems in place, ABN AMRO is able to provide quantifiable data to demonstrate the impact of sustainability risk assessment processes. Specifically, this relates to the number of client transactions subjected to sustainability risk advice or assessment using the Equator Principles, and the outcome of these assessments in terms of projects approved, approved with conditions and declined. The degree of transparency is excellent – ABN AMRO is particularly commended for its disclosure of the number of projects declined as well as approved which provides some indication of the impact of process in place.

In future, the bank is encouraged to offer more detailed analysis of trends by sector over time. The case-studies of dilemmas presented elsewhere in the report are helpful in providing an insight into what these decisions mean in practice in a handful of cases. New/up-dated case-studies could be added to the website during the course of the year.

## 5.2 Employees

The section of the report entitled 'Being an employer of choice' covers ABN AMRO's human resources (HR) strategy and position with regards to human rights, diversity and inclusion, freedom of association, employee training including that relating specifically to sustainability, as well as the bank's approach to HR aspects of restructuring.

### 5.2.1 Position

ABN AMRO's position with regards to a number of employee issues clearly reflects a commitment to be 'an employer of choice'. Most notably, in 2005 it adopted a Human Rights Position Statement setting out in detail what human rights means in relation not only to employees, but also clients, business partners and suppliers. ABN AMRO explicitly states its support for the UN Declaration on Human Rights, the most important international human rights standard, as well as the International Labour Organisation's Declaration of Principles and the UN Global Compact.

It is good to see that diversity and inclusion is included as one of the seven focus areas of ABN AMRO's group-wide human resources (HR) agenda, among other key themes such as leadership development, talent and performance management etc. Efforts in the area of diversity and inclusion are currently focused on gender and ethnicity/nationality but, to its credit, the bank acknowledges the need to address other elements such as age and sexual orientation.

ABN AMRO says it respects the right of all employees to freedom of association. While there does not appear to be a group-wide written policy, the report highlights the activities of trade unions and employee representative bodies in many countries in which the bank operates.

Importantly, ABN AMRO established in 2005 a community of practice on the subject of complaints and devised a formal employee whistle-blowing policy. It is encouraged to report on the number and nature of calls and emails to special telephone lines and email addresses established in all regions.

### 5.2.2 Programme

There is evidence that ABN AMRO is taking steps to implement its recently adopted Human Rights Position Statement and embed sustainability behaviours within the organisation through training. In 2005, the Human Rights Position Statement was communicated to the Top Executive Group and several departments and employee groups – ABN AMRO is encouraged to carry out further awareness raising and training on human rights and responsibilities during the next year.

ABN AMRO is well ahead of its peers in providing customised training on sustainability to a total of 9,420 employees in 2005 (compared to 4,934 in the previous year) which represents a significant proportion of the total workforce. It is particularly promising that several new training modules have been developed, some of which are tailored to specific locations (programmes were carried out in China and Pakistan in 2005) or business areas such as asset management, corporate governance and transaction processing. This focus on enabling staff to link sustainability behaviours to their own work, taking into account both the local and international context, is at the heart of genuine corporate responsibility.

ABN AMRO launched its first group-wide Employee Engagement Survey (EES) in 2005, providing a vital monitoring mechanism on which improved, evidence-based management decisions must be based. Commendably, ABN AMRO has used some of the EES questions to develop a Sustainability Index to monitor the extent to which staff know, recognise and support the bank's sustainability efforts. This will surely provide valuable feedback to help direct the bank's sustainability programme.

Efforts in the area of diversity and inclusion are currently focused on gender and ethnicity/nationality but, to its credit, the bank acknowledges the need to address other elements such as age and sexual orientation. However, issues particularly pertinent to the banking sector such as work/life balance, employee health and treatment for addiction are not addressed.

### 5.2.3 Performance

The results of the Employee Engagement Survey (EES), which achieved a very good response rate of 75%, show good performance in many areas but also room for improvement in some, such as communication and leadership – to ABN AMRO's credit, the results of the survey are presented in the report and will also be cascaded down to employees themselves. ABN AMRO has identified some key measures likely to improve these results in future, notably action plans will be incorporated into line managers' objectives for 2006 and key performance indicators (KPIs) in the areas of leadership and vision, corporate values and business principles have been identified.

Other performance related data included in the report relates to gender, age and ethnic diversity. ABN AMRO acknowledges that there is particular need for improvement in relation to gender diversity – the proportion of women within the Top Executive Group is only 8%.

## 5.3 Community investment

### 5.3.1 Position

The focus of ABN AMRO's community investment efforts is fairly broad, aiming to contribute to the first Millennium Development Goal to reduce poverty. This translates into projects in areas as diverse as income generation, environmental protection and education. While involvement in such a broad range of projects arguably promotes employee participation, it may also dilute the programme's impact both in terms of the benefits to the bank and its community partners. ABN AMRO is encouraged to consider developing a flagship community investment programme to build a more consistent and visible community profile. A well-designed programme could incorporate the various ways in which the bank already contributes, namely via financial donations, in-kind contributions (such as advice and expertise) and employee volunteering. Concentrating resources on a particular partnership or issue would facilitate effective long-term management, including impact assessment, and improved outcomes.

### 5.3.2 Programme

ABN AMRO made strides over the last year towards establishing a group-wide community investment framework which was previously lacking, with activities coordinated at the local level. Importantly, the bank formulated a Group Community Investment Policy and established a Community of Practice (CoP) on Community Investment responsible for overseeing strategy development and community activities. ABN AMRO also established a Foundation with an annual grant of €5 million which aims to provide opportunities for employee involvement. This could be an effective means of developing a network of community champions within the organisation, and the next Sustainability Report will hopefully include some analysis of the benefits of the new organisation structure.

### 5.3.3 Performance

Community investment increased significantly in the reporting year, from €14.5 million in 2004 to €24.2 million in 2005. However, this represents only a fraction of the €47.2 million spent on sponsorship of high profile events with little impact on the primary focus of community efforts to reduce poverty. A more detailed break-down of community investment spend in terms of cash/in-kind contributions on different projects is lacking. Most importantly, ABN AMRO is encouraged to incorporate impact assessment into its key community projects and partnerships in order to identify and develop the business and social benefits.

## 6 Ethical Insight's comment

4 ½ (of 5) Star Rating: ★★★★★

### *Reporting Practices*

**Materiality** – The report appropriately addresses the main material issues from a sustainability perspective with a commendable focus on efforts to integrate sustainability management into mainstream business processes. To this end, the bank appears to have made good use of a structured feedback process following the previous report and extensive stakeholder engagement. The report shows an improvement on the previous year in setting out the ABN AMRO's long term sustainability vision, as well as detailed discussion of activities and performance in six focus areas. Another highlight is the series of case-studies on dilemmas which ABN AMRO is particularly encouraged to keep up-dating on its website and in future reports.

**Transparency** – ABN AMRO's report demonstrates a strong commitment to transparency which both establishes credibility and makes for an engaging read. Points in the text are supported to a large extent by quantitative data. Notably, ABN AMRO sets an example to other signatories of the Equator Principles in disclosing the nature of projects requiring assessment and the number declined as well as approved, thus providing some indication of the Principles' impact. Crucially, the report does not shy away from compliance-related issues. The Managing Board may be seen to have redeemed itself for two serious breaches of compliance by agreeing to pay back a significant proportion of their 2004 bonuses, totalling €1 million. Following the recent launch of whistle-blowing hotlines ABN AMRO will hopefully continue to raise the level of transparency of its reports by including details on the number and nature of concerns. It is also encouraged to report more comprehensively on its political lobbying activities.

**Comparability** – ABN AMRO's 2005 Sustainability Report is compiled in accordance with the Global Reporting Initiative (GRI) 2002 Guidelines, the most widely-used international reporting standard, and its financial services sector supplement. In many instances, the report helpfully assimilates key information, for example regarding the bank's rating on the various sustainability indices. The report identifies the bank's ambitions for the upcoming year in each of the focus areas but lacks targets for the medium-term, as well as a comprehensive set of key performance indicators which would assist in measuring progress over time.

**Assurance and Verification** – In line with good practice, the report is independently assured by a specialist third party, focusing mainly on the accuracy of data and action plans for 2006. While this serves to strengthen the credibility of the report, it is a pity that further details of the auditors' findings and analysis, including key recommendations, are not presented.

### *Review of core issues*

**Business selection and approval** – ABN AMRO demonstrates a genuine commitment to sustainability by attempting to anchor sustainability behaviours into mainstream decision-making and risk assessment processes in the selection and approval of client transactions. Crucially, the bank acknowledges that the primary responsibility for applying sustainability criteria to new business rests with client-facing staff. Procedures are clearly in place to assist these staff in identifying potentially high risk transactions, which are then assessed by a dedicated Sustainable Business Advisory team that sits within the group's Risk Management organisation. As a result, ABN AMRO is able to provide quantifiable data to demonstrate the impact of sustainability risk assessment processes. In future, the bank is encouraged to offer more detailed analysis of trends in each sector over time.

**Employees** – ABN AMRO's decision to adopt a Human Rights Position Statement setting out in detail what human rights means to its various stakeholders clearly reflects a commitment to be 'an employer of choice'. There is also evidence of measures to embed this policy through human rights training which should be cascaded down. ABN AMRO is already well ahead of its peers in providing customised training on sustainability, with an appropriate focus on enabling staff to link sustainability behaviours to their own work. The recently launched Employee Engagement Survey (EES) is also of interest, particularly because it will feed into a Sustainability Index to monitor the extent to which staff know, recognise and support the bank's sustainability efforts. The EES and index promise to be vital monitoring mechanisms which will allow improved, evidence-based management decision-making. The latest findings of the survey show room for improvement in several areas, notably leadership and communication. ABN AMRO is also encouraged to take further steps to improve gender diversity.

**Community investment** – ABN AMRO significantly increased its community investment spend to a fairly respectable €24.2 million in 2005, to be devoted to poverty reduction initiatives. Significant steps have recently been taken towards establishing a group-wide community investment framework, including a new Community Investment Policy and a Foundation with a €5 million per annum grant. Overall, however, activities remain highly decentralised and ABN AMRO is encouraged to develop a flagship programme, incorporating impact assessment, to build a more visible community profile and improved impact.

## 7 Appendices

### 7.1 Maplecroft's Ethical Insight report review criteria

Maplecroft's Ethical Insight report reviews are based on a four-pillar framework, taking into account reporting practices, corporate responsibility management structure, management systems (policy, programme and performance), and certification. The review of management systems considers the company's core issues as identified by the company in its report and by Maplecroft on the basis of the company's industry sector. Maplecroft is currently developing a map of core issues by sector which will be available shortly. The report review criteria are not comprehensive, but are designed to highlight the most significant practices and performance within each company, as well as important omissions and areas for improvement in future reporting.

- **Reporting practices** are reviewed on the basis of four key reporting principles:
  - **Materiality:** Does the report cover all the key issues relevant to the sector? Does the report provide the context and relevance of each issue to the company? Has the company engaged with key stakeholders in identifying and exploring material issues?
  - **Transparency:** Does the report disclose regulatory non-compliance? Does the report make other sensitive or groundbreaking disclosures? Is there public reporting at the local level?
  - **Comparability:** Does the company report in accordance with the GRI guidelines or other external metrics? Have internal metrics and data collection/management systems been developed? Does the report clearly present key indicators and targets?
  - **Assurance and verification:** What type of assurance and verification are provided? What is the scope of assurance and verification? What are the feedback / results of the assurance and verification process?
- **Management structure** is assessed on the basis of three main criteria: Is there a board level CSR Committee (or equivalent) in place? Is there a dedicated CSR network in place? Has the company signed up to any best practice principles or external bodies?
- **Management systems** incorporate principles (governance level), policies (strategic level), procedure and guidance (executive level) and practise (operational level). For a selection of the company's core issues, Maplecroft reviews policy, programme and performance.
- **Certification** refers to the company's listing on sustainability indices, such as the FTSE4Good and Dow Jones; external certification such as SA8000 and ISO14001; and any external awards received during the reporting year.

## 7.2 Previous Ethical Insight report reviews

Ethical Insight includes a review of a company sustainability report in each fortnight's edition. These reviews, together with the original report, can be accessed from the Maplecroft website at <http://www.maplecroft.net>.

Previous Maplecroft reviews are as follows:

- ABN Amro Sustainability Report 2003
- Alcan Corporate Sustainability Report 2004 and 2005
- Alcatel - Sustainable Development Report 2004
- Anglo American Report to Society 2004
- BAA Annual Report 2003/2004
- BAE Systems Corporate Responsibility Report 2003
- BBC Corporate Sustainability Report 2004
- BHP Billiton Sustainability Report 2005
- BP Sustainability Review 2004
- Cadbury Schweppes Corporate and Social Responsibility Report 2004
- Citigroup Citizenship Report Review 2004
- Coca-Cola's 2004 Citizenship Report
- Commerzbank Corporate Responsibility Report 2005
- Co-operative Group corporate responsibility report 2003
- Ford Sustainability Report 2004/05
- HSBC Corporate Social Responsibility Report 2004
- Hydro Corporate Social Responsibility Annual Report 2003
- Marks & Spencer Corporate Social Responsibility Report 2005
- Merck Corporate Responsibility Report 2005
- NEC Corporate Social Responsibility Report 2005
- Nike Corporate Responsibility Report 2004
- Rio Tinto 2004 Sustainable Development Review
- Royal Bank of Scotland's Corporate Responsibility Report 2004
- Royal Mail Corporate Responsibility Report 2004
- RWE Corporate Responsibility Report 2003
- Shell Foundation 'Enterprise solutions to poverty' Report 2005
- Standard Chartered 2004 Corporate Responsibility Report
- TNT Social Responsibility Report 2005
- TPG Annual Report 2003
- TPG Corporate Sustainability Report 2004
- Unilever Social and Environmental Reports 2004
- Vodafone Corporate Social Responsibility Report 2003/04
- Volkswagen Sustainability Report 2005/06
- WestLB Sustainability Report 2005
- Westpac Stakeholder Impact Report 2004

### 7.3 Ethical Insight's sustainability reporting services

The Ethical Insight team at Maplecroft works with global organisations across all sectors, providing a range of specialist corporate responsibility advisory services. Further details about the wider range of Maplecroft services and the Maplecroft team are available at <http://www.maplecroft.net>.

In the area of sustainability reporting, we have considerable expertise in the full range of management systems that underlie effective social and environmental reporting, including auditing, indicators, monitoring, impact assessment and performance management. Maplecroft is also experienced in report writing, verification and assurance, having contributed substantively to several award winning reports.

The Ethical Insight team is also able to provide independent assurance and verification services of the highest standard, including in accordance with GRI and AA1000 criteria.

Maplecroft has developed a number of proprietary tools to assist companies in the reporting process. Specifically, we have developed the *Principles-plus multi-audit etool*, a practical and comprehensive auditing method that brings together a host of social and environmental standards, international best practice principles and instruments of corporate citizenship in a set of worksheets. The tool is designed to help companies assess their conformance with best practice requirements and identify the specific areas in which performance can be improved. A corrective action request form assists in the performance management process.

Maplecroft has also developed a *Human rights monitoring mechanism*, a straightforward electronic human rights survey, which can be used and adapted by companies to provide a detailed picture of human rights risk in its operations around the world. The survey assesses the human rights situation and management systems in place at the country level which, together with external country and issue specific human rights research, allow for a detailed analysis of the company's risk of complicity in human rights violations, and specific recommended action points.

The Ethical Insight team comprise fully trained and experienced SA8000 and ISO14001 auditors.

Please call us or email to discuss how our award winning Ethical Insight team might help:

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