



# ecovadis

## EcoVadis Sustainability Assessment Report

Company rated:  
KEVIN M EHRINGER ENTERPRISES INC

Overall score: 66 /100  
January 2022

Sustainability performance: Advanced

Size: S  
Headquarters country: United States of America  
Risk country operations: NO  
Industry: Manufacture of wiring and wiring devices

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## ABOUT SUSTAINABILITY

Sustainability is the continuing commitment to act responsibly by integrating social and environmental concerns into business operations. Sustainability goes beyond regulatory compliance to focus on how companies manage their economic, social and environmental impacts, as well as their relationships with stakeholders (e.g. employees, trading partners, government).

## ABOUT THE ASSESSMENT

The EcoVadis methodology framework assesses companies' policies and actions as well as their published reporting related to the environment, labor and human rights, ethics and sustainable procurement. Our team of international sustainability experts analyze and crosscheck companies' data (supporting documents, 360° Watch Findings, etc.) in order to create reliable ratings, taking into account each company's industry, size and geographic location.

## ABOUT ECOVADIS

EcoVadis provides the leading solution for monitoring sustainability in global supply chains. Using innovative technology and sustainability expertise, we strive to engage companies and help them adopt sustainable practices.

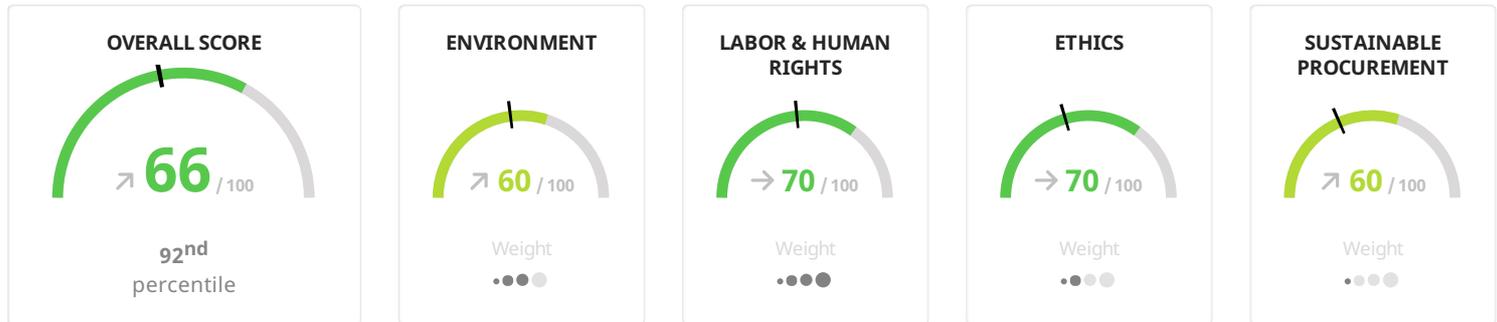
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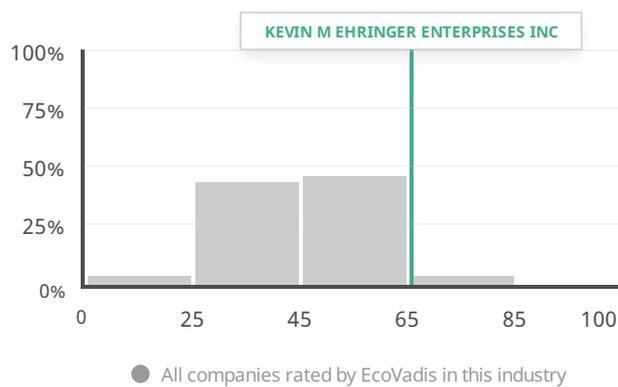
# 1. SUSTAINABILITY PERFORMANCE OVERVIEW

## Score breakdown

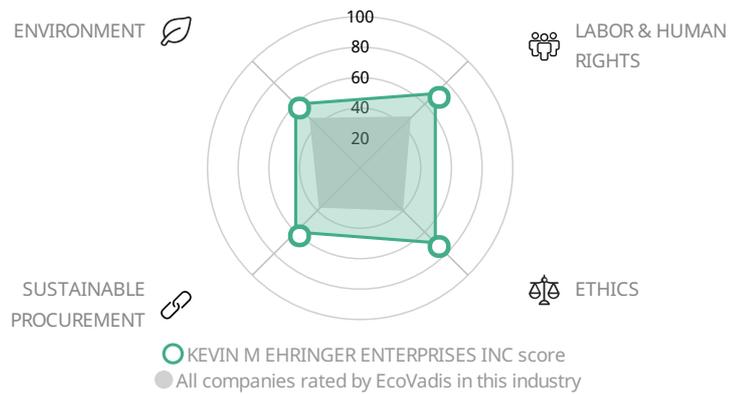
Sustainability performance ● Insufficient ● Partial ● Moderate ● Advanced ● Outstanding — Average score



## Overall score distribution



## Theme score comparison



KEVIN M EHRINGER ENTERPRISES INC has been awarded a silver medal in recognition of sustainability achievement! To receive this medal, companies must have an overall score of 56-67.

## Corrective Action Plan in progress

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. KEVIN M EHRINGER ENTERPRISES INC has a corrective action plan in place and is working on improving their sustainability management system.

\* You are receiving this score/medal based on the disclosed information and news resources available to EcoVadis at the time of assessment. Should any information or circumstances change materially during the period of the scorecard/medal validity, EcoVadis reserves the right to place the business' scorecard/medal on hold and, if considered appropriate, to re-assess and possibly issue a revised scorecard/medal.

## 2. ASSESSMENT BENEFITS

### Understand :

**Get a clear picture of a company’s sustainability performance.** The scorecard is the final output of the EcoVadis assessment. It rates and benchmarks a company’s sustainability performance in four themes on a scale of 0-100 and highlights strengths and improvement areas.

**Know where a company stands compared to their industry.** Benchmark the company’s sustainability performance against the industry with a score distribution graph and theme score comparisons.

**Identify industry trends.** Discover the primary sustainability risks, regulations, hot topics and best practices related to specific industries.

### Communicate :

**Meet customer needs.** More and more companies raise questions about their trading partners’ environmental and social performance. The EcoVadis assessment allows companies to demonstrate their commitment.

**Leverage a unique communication tool.** Companies with an EcoVadis Scorecard avoid audit fatigue by sharing one assessment with all requesting customers.

## 3. ASSESSMENT PROCESS

1

### Customer Request

Procurement, CSR, EHS, and Sustainability leaders in enterprises looking to monitor sustainability risk in the supply chain request an EcoVadis assessment for their trading partners.

2

### Questionnaire

Based on a company’s specific sustainability risk factors, a customized questionnaire is created. It contains 20 to 50 questions tailored to the industry, size and location.

3

### Document Analysis

Companies are required to provide supporting documentation for their answers to the questionnaire. These documents are reviewed by our analysts.

4

### Public Information

Company information that is publicly available, most often found on the company website, is also collected as evidence of their sustainability performance.

5

### 360° Watch Findings

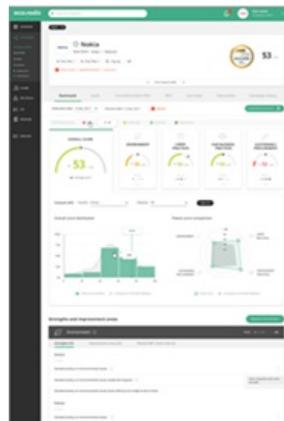
360° Watch Findings comprise relevant public information about companies’ sustainability practices, identified via more than 2,500 data sources. They can have positive, negative or no score impact.

6

### Expert Analysis

Our analysts combine all these elements to produce one unified scorecard per company.

### SCORECARD



## 4. ECOVADIS METHODOLOGY

### A. Four Themes and 21 Criteria

EcoVadis assessments focus on 21 issues which are grouped into 4 themes (Environment, Labor & Human Rights, Ethics, Sustainable Procurement). The 21 issues or criteria are based upon international sustainability standards such as the Global Compact Principles, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standard, the ISO 26000 standard, and the CERES principles.

#### 21 sustainability criteria

#### 1. ENVIRONMENT

##### OPERATIONS

Energy consumption & GHGs  
Water  
Biodiversity  
Local & Accidental Pollution  
Materials, Chemicals & Waste

##### PRODUCTS

Product Use  
Product End-of-Life  
Customer Health & Safety  
Environmental Services & Advocacy

#### 2. LABOR & HUMAN RIGHTS

##### HUMAN RESOURCES

Employee Health & Safety  
Working Conditions  
Social Dialogue  
Career Management & Training

##### HUMAN RIGHTS

Child Labor, Forced Labor & Human Trafficking  
Diversity, Discrimination & Harassment  
External Stakeholders Human Rights

#### 3. ETHICS

Corruption  
Anticompetitive Practices  
Responsible Information Management

#### 4. SUSTAINABLE PROCUREMENT

Supplier Environmental Practices  
Supplier Social Practices



### B. Seven Management Indicators

EcoVadis assessments evaluate a company's sustainability management system by looking at seven management indicators. These are used to further customize the assessment by weighting the four themes and their subsequent 21 sustainability criteria.



#### Policies (weight: 25%)

1. Policies: Mission statements, policies, objectives, targets, governance
2. Endorsement: Endorsement of external sustainability initiatives

#### Actions (weight: 40%)

3. Measures: Measures and actions implemented (e.g. procedures, training, equipment)
4. Certifications: Certifications and labels (e.g. ISO 14001)
5. Coverage: Coverage of measures and actions

#### Results (weight: 35%)

6. Reporting: Reporting on Key Performance Indicators (KPIs)
7. 360: Condemnations, Controversies, Awards

## 5. UNDERSTANDING A SCORECARD

The overall score can be better understood by looking at quantitative information (theme scores and activated criteria) and qualitative information (strengths and improvement areas).

### A. Quantitative Information: Scores & Activated Criteria

#### Theme Scores:

Like the overall score, theme scores are on a scale of 1 to 100.

#### Activated Criteria:

Each of the four themes (Environment, Labor & Human Rights, Ethics, Sustainable Procurement) have specific criteria associated with them. Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Non-activated

If certain criteria are not activated, then the specific associated issue is not relevant or has very low sustainability risk for that company.

Medium

Medium importance criteria are the issues some sustainability risk is present but not the most pressing.

High

High importance criteria are the issues where the company faces the greatest sustainability risk.

#### ! Risk countries only

Criteria classified as Only in Risk Countries are activated only if the company has significant operations in one or more countries identified as risky.

### C. The Scoring Scale

0 - 24	Insufficient	No engagements or tangible actions regarding sustainability. Evidence in certain cases of misconduct (e.g. pollution, corruption).
25 - 44	Partial	No structured sustainability approach. Few engagements or tangible actions on selected issues. Partial reporting on Key Performance Indicators. Partial certification or occasional labeled product.
45 - 64	Moderate	Structured and proactive sustainability approach. Engagements/policies and tangible actions on major issues. Basic reporting on actions or Key Performance Indicators.
65 - 84	Advanced	Structured and proactive sustainability approach. Engagements/policies and tangible actions on major issues with detailed implementation information. Significant sustainability reporting on actions and Key Performance Indicators.
85 - 100	Outstanding	Structured and proactive sustainability approach. Engagements/policies and tangible actions on all issues with detailed implementation information. Comprehensive sustainability reporting on actions and Key Performance Indicators. Innovative practices and external recognition.

### B. Qualitative Information: Strengths & Improvement Areas

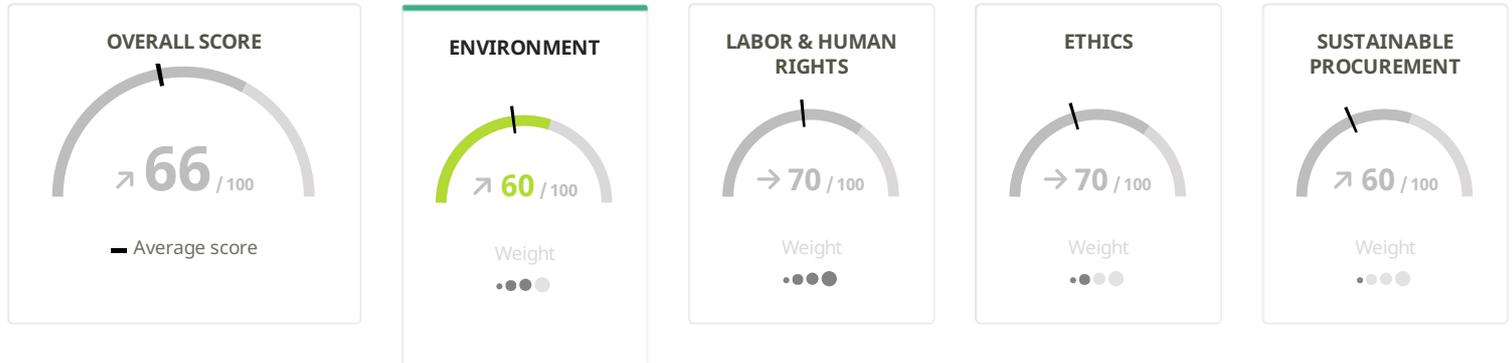
Qualitative information provides more details and insights into a company's score. For each theme, the company is assigned strengths (elements of their sustainability management system that are positive) and improvement areas (elements of their sustainability management system that need to be improved). The strengths and improvement areas are divided according to the three management layers (Policies, Actions, Results) and are also classified by priority.

All improvement areas are automatically added to the company's Corrective Action Plan. They are pre-organized by priority. The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback.

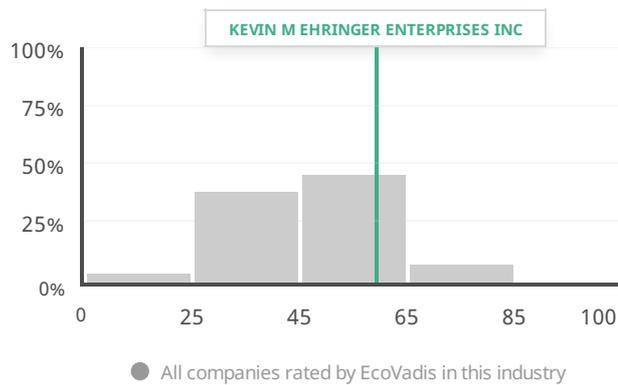
## 6. ENVIRONMENT

This theme takes into account both operational factors (e.g. energy consumption, waste management) and product stewardship (e.g. product end-of-life, customer health and safety issues).

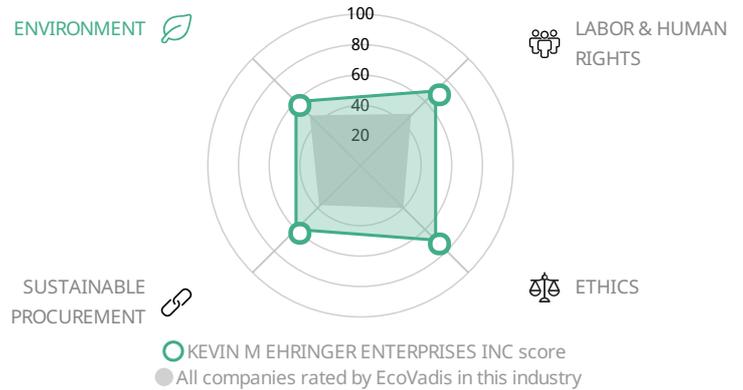
### Environment Score Breakdown



Theme score distribution



Theme score comparison



#### Environment: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Environment: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

**Strengths (13)**

**Policies**

**Environmental policy on customer health & safety**

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**Environmental policy on product end-of-life**

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**Environmental policy on product use**

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**Environmental policy on materials, chemicals & waste**

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**Environmental policy on water**

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**Environmental policy on energy consumption & GHGs**

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**Standard policy on a majority of environmental issues**

**Information**

A standard environmental policy includes commitments and/or operational objectives on the main environmental risks the company faces.

**Guidance**

A comprehensive environmental policy includes commitments and/or operational objectives on the majority of environmental risks the company faces, and integrates quantitative objectives (i.e. targets) on those risks. It is also mandatory for the policy to incorporate some of the following organizational elements: scope of application, allocation of responsibilities, and/or a formal review process. Policies are deemed exceptional when all environmental issues are covered by qualitative and quantitative objectives, in addition to all of the aforementioned elements.

**Endorsement of the United Nations Global Compact (UNGC) (at parent company level)**

**Information**

The company's parent company is a Global Compact Signatory.

**Guidance**

The United Nations Global Compact (UNGC) is a voluntary initiative that encourages businesses worldwide to adopt sustainable and socially responsible policies, and to report on them. Global Compact participants commit to respecting 10 principles on human rights, labor rights, the environment and anti-corruption. The initiative has a mandatory disclosure framework, which obliges business participants to annually report on their progress against the 10 principles in a Communication on Progress (COP). Companies that do not comply with this reporting requirement are removed (or "delisted") from the list of participants after two years.

**Actions**

**Declares all relevant products meet RoHS 2 requirements (not verified)**

**Information**

The company declares that all of its relevant products meet RoHS 2 requirements. This strength is activated solely based on the questionnaire claim, and is not verified within supporting documentation provided by the company.

**Guidance**

The Restriction of Hazardous Substances Directive 2002/95/EC, (RoHS), aims at eradicating certain hazardous substances from new electrical and electronic equipment (EEE). All manufacturers, distributors, importers and authorized representatives of EEE (Electrical and Electronic Equipment) within the scope of the Directive are responsible for ensuring that their products meet the requirements of the Directive. To demonstrate compliance, they must prove that all components, materials, sub-assemblies etc that comprise the product are RoHS compliant. This can be done through the setting up of a technical file containing all the analysis and component data and this must be kept for at least four years from the date the equipment was put on the market. Note that the European Commission website can be consulted for more information on the criteria to satisfy to determine whether or not equipment is within the scope of the RoHS directive ([http://ec.europa.eu/environment/waste/rohs\\_eee/index\\_en.htm](http://ec.europa.eu/environment/waste/rohs_eee/index_en.htm))

**Declares products are not subject to the European Waste Electrical and Electronic Equipment (WEEE) Directive (not verified)**

**Information**

The company declares that its products are not subject to the European Waste Electrical and Electronic Equipment (WEEE) Directive. This strength is activated solely based on the questionnaire claim, and is not verified within supporting documentation provided by the company.

**Guidance**

The Waste Electrical and Electronic Equipment Directive (WEEE Directive) aims to reduce the amount of WEEE sent for disposal to landfill or incineration by requiring producers to arrange for collection and recycling. Producers and importers of Waste Electrical and Electronic Equipment (WEEE) are responsible for financing the collection, treatment and recovery of WEEE while importers and manufacturers of appliances falling within the scope of the legislation are responsible for the take-back and recycling of appliances discarded by consumers. On the other side, distributors (including retailers) have to make sure that consumers can recycle their WEEE. Note that the European Commission website can be consulted to get more information on the criteria necessary to determine whether or not equipment is within the scope of the WEEE Directive ([http://ec.europa.eu/environment/waste/wEEE/index\\_en.htm](http://ec.europa.eu/environment/waste/wEEE/index_en.htm)).

**Measures or innovative technologies implemented to reduce, recycle or reuse waste**

**Information**

The company has implemented measures for reducing and/or reusing waste. These measures can be a new process, a facility feature, an operational procedure, a management practice, etc.

**Guidance**

In order to reduce the amount of waste generated, the company can select to modify its current arrangements by upgrading or changing current equipment (or technologies) in place to optimize the production process. Companies can also reuse or recycle the waste generated from operations as an input into downstream processes to avoid sending that waste to landfill.

**Results**

**Reporting on total water consumption**

**Reporting on total energy consumption**

**Information**

The company has reported KPIs with regard to total energy consumption either through formal documentation or questionnaire declaration.

**Guidance**

Total energy consumed represents total primary energy consumption reported in kWh. Total energy consumed may include e.g. consumption of coal and coke (in Kg) reported in kWh and/or consumption of oil, LPG and electrical power in kWh.

**Improvement Areas (12)**

**Policies**

Low

No quantitative target on environmental issues

**Information**

The company's policy does not contain quantitative objectives or targets on environmental issues.

**Guidance**

Quantitative objectives or targets on environmental issues are considered as fundamental elements of comprehensive policy mechanism. They provide a monitoring framework that helps establish whether policy objectives are being met, and highlight the progress towards set goals. Some examples of specific targets on this topic include quantitative objectives on energy consumption reduction, percentage targets to reduce waste, or targets for a number of products to be eco-labelled. As policy elements, targets can be expressed in absolute or relative terms and must have a valid future deadline (i.e. by 2020 we commit to reduce our energy consumption by 20% from 2015 levels). Download the How-to Guide on this topic here (in English).

**Actions**

High

No information on ISO 14001/EMAS certification

**Information**

No company declaration and no evidence within the supporting documentation on ISO 14001 or EMAS certifications achieved for at least one of its operational sites.

**Guidance**

The ISO 14001 standard belongs to the ISO 14000 series, a family of environmental management standards developed by the International Organization for Standardization (ISO) designed to provide an internationally recognized framework for environmental management, measurement, evaluation and auditing. The standard serves as a framework to assist organizations in developing their own environmental management system and is based on the continuous Plan-Do-Check-Act cycle. The Eco-Management and Audit Scheme (EMAS) an EU voluntary instrument which acknowledges organizations that evaluate, report, and improve their environmental performance on a continuous basis. Organizations located outside the EU Community can also participate (EMAS Global). Some examples of evidence used to demonstrate the coverage of ISO 14001 or EMAS certifications include (but are not limited to): - Individual certificates for each certified site; - A certificate annex clearly stating each individual site covered by the certificate - A sample certificate for one site, along with formalized reporting in a third-party verified report (i.e. Sustainability Report, Annual Report), which includes the percentage of sites covered by the ISO 14001 or EMAS certification, etc.

Medium

No information on measures regarding energy consumption & GHGs

**Information**

No company declaration and no evidence within the supporting documentation on actions implemented on the reduction of energy consumption & GHG emissions.

**Guidance**

Some examples of actions on this topic include: carbon footprint assessment, installation of innovative equipment to reduce energy consumption, and awareness training of employees on energy consumption issues. Download the How-to Guide on this topic here.

Low

No information on measures regarding environmental impacts from product end-of-life

**Information**

No company declaration and no evidence in the supporting documentation on actions implemented to mitigate environmental impacts from product end-of-life.

**Guidance**

Some examples of actions on this topic include company take back programs, formal life cycle analysis on key products and designing packaging for easy dismantling or recyclability.

Low

No information on measures regarding customer health & safety

**Information**

No company declaration and no evidence within the supporting documentation of actions implemented regarding customer health & safety.

**Guidance**

Some examples of actions on this topic include: provision of information for consumer protection, and application of recognized standards to eliminate harmful effects or hazardous defects from products or services.

Low

Declares measures on water management, but no supporting documentation available

**Information**

The company declares it has implemented specific actions on water management, however, no information was found on this topic within the company's supporting documentation.

**Guidance**

Some examples of actions on this topic include: water treatment, recycling and reuse, reduction of wastewater discharge, measurement and control mechanisms for organic water pollutant (BOD) or chemical oxygen demand (COD). Download the How-to Guide on this topic here.

Low

Declares measures on environmental impacts from product use, but no supporting documentation available

**Information**

The company declares it has implemented concrete actions regarding product use, but no information was found on this topic within the supporting documentation.

**Guidance**

Some examples of actions on this topic include: a formal life cycle analysis on key products, eco-design measures implemented to reduce product weight, analysis of substances within the scope of REACH and a carbon footprint study on key products.

**Results**

High

Reporting available on environmental issues, but some material topics are not covered

**Information**

There is some evidence of formal reporting on environmental issues in the supporting documentation. It may include key performance indicators (KPIs), or statistical figures. However reporting elements may be limited in terms of quality or quantity, may not cover the main issues, or reporting is not regularly updated.

**Guidance**

Based on the information provided for the assessment, reporting does not cover a major portion of relevant issues. To improve the quality of reporting, KPIs could include material issues for the company's environmental performance. For example, annual figures on electricity consumption and GHG emissions, waste management, or any other available KPIs. For more information on the specific environmental performance KPIs please refer to the GRI Standards. Download the How-to Guide on this topic here (in English).

Low

No information on reporting on total weight of hazardous waste

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Low

No information on reporting on total weight of non-hazardous waste

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Low

No information on reporting on total Scope 1 GHG emissions

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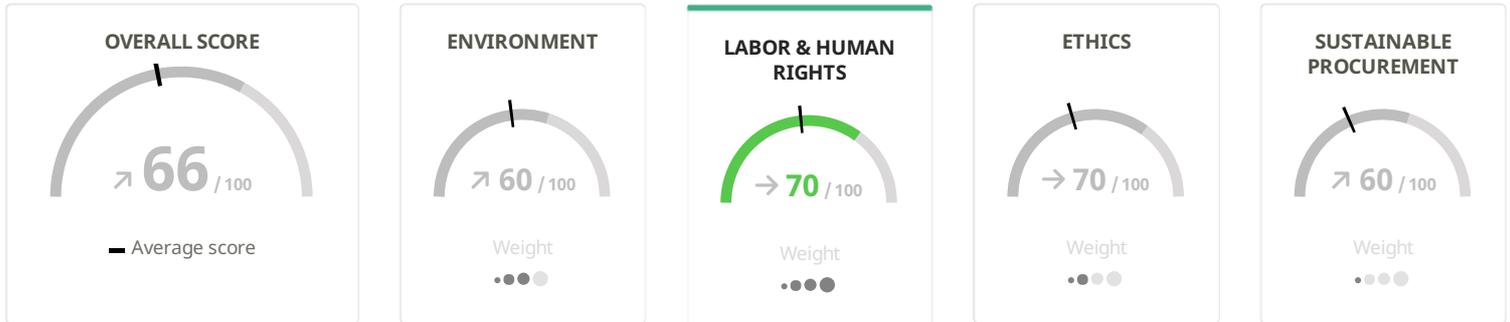
Low

No information on reporting on total Scope 2 GHG emissions

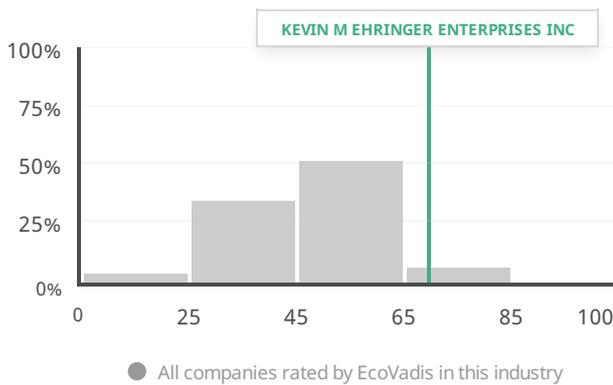
## 7. LABOR & HUMAN RIGHTS

This theme takes into account both internal human resources (e.g. health and safety, working conditions, career management) and human rights issues (e.g. discrimination and/or harassment, child labor).

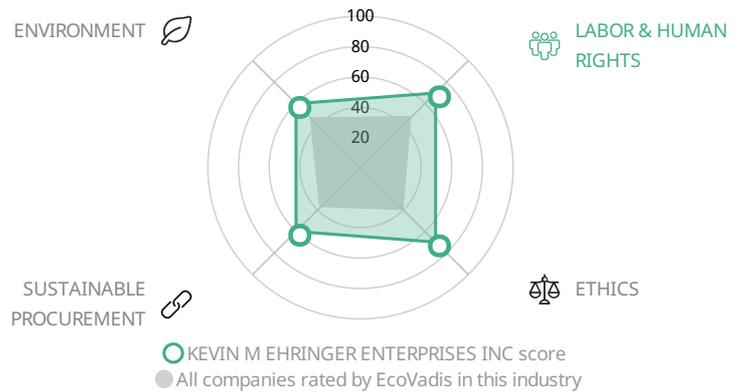
### Labor & Human Rights Score Breakdown



Theme score distribution



Theme score comparison



#### Labor & Human Rights: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Labor & Human Rights: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.



Strengths (25)

Policies

Labor & human rights policy on diversity, discrimination & harassment

Labor & human rights policy on career management & training

Labor & human rights policy on employee health & safety

Standard policy on a majority of labor or human rights issues

Information

A standard labor and human rights policy includes commitments and/or operational objectives on the main labor and human rights risks the company faces.

Guidance

A comprehensive labor and human rights policy includes commitments and/or operational objectives on the majority of labor and human rights risks the company faces, and integrates quantitative objectives (i.e. targets) on those risks. It is also mandatory for the policy to incorporate some of the following elements: scope of application, allocation of responsibilities, and/or a formal review process. Policies are deemed exceptional when all labor practice and human rights issues are covered by qualitative and quantitative objectives, in addition to all of the aforementioned elements.

Endorsement of the United Nations Global Compact (UNGC) (at parent company level)

Information

The company's parent company is a Global Compact Signatory.

Guidance

The United Nations Global Compact (UNGC) is a voluntary initiative that encourages businesses worldwide to adopt sustainable and socially responsible policies, and to report on them. Global Compact participants commit to respecting 10 principles on human rights, labor rights, the environment and anti-corruption. The initiative has a mandatory disclosure framework, which obliges business participants to annually report on their progress against the 10 principles in a Communication on Progress (COP). Companies that do not comply with this reporting requirement are removed (or "delisted") from the list of participants after two years.

Actions

Compensation for extra or atypical working hours

Information

The company provides additional remuneration to compensate for overtime work.

Guidance

Extra or atypical hours refers to all hours worked in excess of the normal hours (could be overtime hours for instance). Employees should be provided additional compensation for overtime and/or other forms of atypical working hours.

**Additional leave beyond standard vacation days**

**Information**

The company has official measures to promote work-life balance in place, which have been found within the supporting documentation. The company provides additional leave beyond vacation days mandated by local regulations.

**Guidance**

The company has implemented working practices that acknowledge and aim to support the needs of staff in achieving a balance between their home and working lives. The company provides additional days of leave for employees, outside of standard vacation days mandated by regulations. Additional days of leave can include paternal leave, bereavement leave, jury duty, election day leave, and sabbatical leave.

**Employee satisfaction survey**

**Information**

The company conducts a survey to employees regarding satisfaction in the work environment.

**Guidance**

An employee satisfaction survey can be conducted by companies to gain information on how and if employees are satisfied in the work environment. The results of these surveys can be used by companies to get feedback on employees about their engagement, morale, and satisfaction at work.

**Flexible organization of work available to employees (e.g. remote work, flexitime)**

**Information**

The company has official measures to promote work-life balance in place, which have been found within the supporting documentation. The company provides flexible hours and organization for employees to work.

**Guidance**

The company has implemented working practices that acknowledge and aim to support the needs of staff in achieving a balance between their home and working lives. The company has supporting documentation showing a flexible organization of working hours is provided for employees, which can include evidence of options for part-time work, telecommuting or remote work, job-shares, and other forms of variable work schedules.

**Health care coverage of employees in place**

**Whistleblower procedure on discrimination and harassment**

**Information**

The company has implemented a formal whistleblower procedure which encourages employees (and external stakeholders) to report potential violations of the company's discrimination and/or harassment policies.

**Guidance**

Employees can report on areas such as violations of the company's discrimination and/or harassment policy (e.g. on hiring, remuneration, training, promotion) through anonymous and secure communication channels. In addition, non-retaliation is ensured.

**Training on health and safety issues for subcontractors working on the company premises**

**Information**

The company trains its subcontractors on health and safety issues on the company premises.

**Guidance**

The company has implemented training on health and safety issues for its subcontractors. Safety training aims at implementing health and safety procedures into specific job practices and at raising awareness and skills to an acceptable standard. For example, safety training covers topics such as accident prevention and safety promotion, safety compliance, use of personal protective equipment, chemical and hazardous materials safety, and workplace emergency response procedures. A best practice is to have a training matrix which helps to keep track of which subcontractors have been trained, the date of the training, the training topic, and expected dates for refresher trainings. Monitoring of training attendance certificates is also suggested. It is also a best practice to have the training carried out in the language that the subcontractor understands best and to carry out tests or quizzes to ensure training concepts have been successfully transmitted to participants.

**Internal audits on health & safety issues**

**Information**

The company carries out internal audits on health & safety issues

**Guidance**

Internal audits of the operational health and safety management system are conducted in order to determine whether the management system complies with the functioning plan for health and safety management, with respect to legal requirements or to standards the company wishes to achieve beyond compliance. Internal audits are done to review and evaluate the performance and effectiveness of procedures in place, and are useful to expose gaps in the effective implementation of the health and safety management system. A typical internal audit programme, includes series of audits, is established for one year and covers all the relevant areas and activities stipulated by the audit criteria/requirements.

**Measures for the integration of senior employees**

**Information**

The company has implemented specific measures for the integration of seniors within the organization

**Guidance**

The company has implemented measures to integrate senior employees such as offering senior employees workplace flexibility, technical assistance, periodic re-training, and Deferred Retirement Option Plans. Achieving the integration and participation of older persons in the company is important, to avoid discrimination. This will lead to a better quality of life for older persons and increased social cohesion within the company.

**Provision of protective equipment to all impacted employees**

**Information**

The company provides personal protective equipment to all impacted employees

**Guidance**

Personal protective equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to a variety of health and safety hazards. Examples of PPE include items such as gloves, foot and eye protection, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits. (Source: Occupational Safety and Health Administration (OSHA)) When engineering, work practice and administrative controls are not feasible or do not provide sufficient protection, employers must provide personal protective equipment (PPE) to their employees and ensure their systematic use. In general, employees should properly wear PPE, attend training sessions on PPE, care for, clean and maintain PPE, and inform a supervisor of the need to repair or replace PPE.

**Employee health & safety detailed risk assessment**

**Information**

The company carries out employee health & safety detailed risk assessments

**Guidance**

The company has carried out detailed risk assessment of health and safety. Occupational health and safety risk assessments are a crucial step in the prevention process. They involve the identification of all the potential hazards an employee may face while carrying out regular duties and which type of employees may be more exposed to hazards (by job function). The level of risk, records of significant findings and proposition of preventive actions are also highlighted, in addition to plans for regular review of the risk assessment. If applicable, the results of a health and safety risk assessment should be made available to relevant stakeholders such as employees, members of the health and safety committee, staff representatives, the occupational physicians, and labor inspectors.

**Regular assessment (at least once a year) of individual performance**

**Information**

The company carries out regular assessments or appraisal of individual performance at least on a yearly basis for employees

**Guidance**

The company has implemented regular assessment of employee performance. Regular assessments of employees aim to evaluate employee individual performance and productivity, combining both written and oral elements, and are based on a systematic and periodic process linked with a pre-established criteria and organizational objectives. The best practice concerning this criteria is to have a review with the employee at least annually, and to include employee self-assessments aimed at maintaining employee engagement in their own performance and overall organizational objectives. Setting and measuring goals related to the employee's career objectives, as well as including manager and peer feedback on the employee's performance are all important components in this regular assessment process.

**Active preventive measures for stress and noise**

**Information**

The company has preventive measures in place against stress and noise

**Guidance**

The company has measures in place to monitor, prevent and report on noise level and to control the stress level of employees within the company premises. Noise-induced hearing loss is one of the most prominent and most recognised occupational diseases in the Member States of the European Union. Typical sectors for workers exposed to loud noises include construction, agriculture, forestry, manufacturing of metal and wood, mining and quarrying. The definition of stress used by Health and Safety Executive (HSE), namely "the adverse reaction people have to excessive pressures or other types of demand placed on them." Work-related stress can be caused by poor work design (for example, lack of control over work processes), poor management, unsatisfactory working conditions, and a lack of support from colleagues and supervisors. Some examples of measures to reduce stress include: provision of appropriate employee support services, conducting stress risk assessments, ensuring that employees are appropriately trained to fulfill their roles, monitoring working hours and overtime, ensuring that employees take their full holiday entitlement, and offering appropriate support to employees who are experiencing stress outside of work.

**Health & safety procedures translated in major languages spoken by employees**

**Information**

The company has provided supporting documentation demonstrating that it provides health & safety procedures translated in major languages.

**Guidance**

To ensure that the company has a rigorous health and safety management system in place, employees need to be trained on health and safety procedures. Language can be a barrier to achieving total comprehension of the issues if the employees are non-English speakers, depending on where the company is operating. To address this issue of inadequate communication, health & safety procedures can be translated in languages which are completely understood by the employees, especially in the case of migrant workers.

**Provision of skills development training**

**Information**

The company provides training to its employees to develop their skills

**Guidance**

The company has implemented vocational training and instruction, which include skills development training, education paid for in whole or in part by the company, with the goal to provide opportunities for career advancement (Source: Global Reporting Initiative G3). Examples of on-the-job training to enhance employee skills are coaching, mentoring, job rotation, apprenticeships, etc. Total number of hours of training per employee per year can be a significant key performance indicator for this action.

**Specific measures implemented for the integration of employees with disabilities**

**Information**

The company has implemented specific measures to integrate disabled persons into the workforce.

**Guidance**

Emerging studies determine that there is a true business case for the integration of disabled employees into the workforce beyond its roots as a socially responsible business practice. Evidence states that disabled employees have comparable productivity rates, lower accident rates, and higher job retention trends. People with disabilities also represent an untapped source of skills and talent, including technical skills if they have access to training and transferable problem-solving skills developed in daily life. Hiring disabled employees can contribute to the overall diversity, creativity and workplace morale. Some potential examples of implementation measures could include specific outreach techniques and programs, the provision of reasonable accommodation to meet individual needs, and allocating designated human resources management staff with knowledge on disadvantaged or work-related disability issues, etc. (source: ILO)

**Setting of individual career plan for all employees**

**Information**

The company has implemented mechanisms to help employees in setting individual career plans

**Guidance**

Career planning is an ongoing process that can help employees manage their learning and development/progress within the company. It is also a key component of a company's attraction and retention strategy. The company has mechanisms in place to provide career opportunities to employees, allowing them to access to promotions and higher pay. For example, an individual development plan can be put in place by analyzing skills and competencies needed by the employees to achieve their short, mid and long term goals. This process should also be coupled with the annual review process of the employee.

**Training of relevant employees on health & safety risks and best working practices**

**Information**

The company provides training to relevant employees on health and safety risks and best working practices

**Guidance**

The company has implemented training on health and safety issues. Safety training aims at implementing health and safety procedures into specific job practices and at raising staff awareness and skills to an acceptable standard. For example, safety training covers topics such as accident prevention and safety promotion, safety compliance, use of personal protective equipment, chemical and hazardous materials safety, and workplace emergency response procedures. A best practice is to have a training matrix which helps to keep track of which employees have been trained, the date of the training, the training topic, and expected dates for refresher trainings. Monitoring of training attendance certificates is also suggested. It is also a best practice to have the training carried out in the language that the employees understand best and to carry out tests or quizzes to ensure training concepts have been successfully transmitted to participants.

**Results**

**Reporting on accident severity rate**

**Information**

The company reports, either through formal documentation or questionnaire declaration, on the accident severity rate among its employees for the last reporting year.

**Guidance**

The accident severity rate (or Lost Time Injury Severity Rate) measures the time lost due to occupational injuries in relation to the total amount of time worked. It indicates how severe the accidents were and how long the injured employees were out of work as a result of disabling injuries. The calculation method varies from country to country; for instance in the way lost time injury events are determined or what baseline is used to calculate the rate. In the UK it is calculated as follows:  $[(\text{number of days lost due to injuries}) \times 200,000 / \text{total hours worked}]$ , whereas in France it is:  $[(\text{number of days lost due to injuries}) \times 1000 / \text{total hours worked}]$ . In India, the rate is calculated as  $[(\text{number of days lost due to injuries}) \times 1,000,000 / \text{total hours worked}]$ . Download the How-to Guide on this topic here (in English).

**Reporting on accident frequency rate**

**Information**

The company reports, either through formal documentation or questionnaire declaration, on the accident frequency rate among its employees for the last reporting year.

**Guidance**

The accident frequency rate (or the lost time injury frequency rate) measures the number of lost time injuries in relation to the total number of hours worked by employees. It indicates the extent to which injury accidents are repeated over time and their number of occurrence. The calculation method varies from country to country, depending for instance on the way lost time injury events are determined or the baseline used to calculate the rate. In the UK it is calculated as follows:  $[(\text{total number of lost time injury events}) \times 100,000 / \text{total hours worked}]$ , whereas in USA it is:  $[(\text{total number of lost time injury events}) \times 200,000 / \text{total hours worked}]$ . In France or Japan, the rate is calculated as  $[(\text{total number of lost time injury events}) \times 1,000,000 / \text{total hours worked}]$  Download the How-to Guide on this topic here (in English).

**Improvement Areas (7)**

**Policies**

Medium

Inconclusive documentation for policies on working conditions

Medium

Inconclusive documentation for policies on child labor, forced labor & human trafficking

Low

No quantitative target on labor and human rights issues

**Information**

Company policy does not contain quantitative targets on labor and human rights issues.

**Guidance**

Quantitative objectives or targets on labor and human rights issues are considered as fundamental elements of comprehensive policy mechanism. They provide a monitoring framework that helps establish whether policy objectives are being met, and highlight the progress towards set goals. Some examples of specific targets on this topic include quantitative objectives on health & safety indicators (i.e. accident frequency and accident severity rates), quantitative objectives on percentage of employees trained on discrimination and quantitative objectives on number of employees covered by social benefits. As policy elements, targets can be expressed in absolute or relative terms and must have a valid future deadline (i.e. by 2020 we commit to train 100% of employees on discrimination). Download the How-to Guide on this topic here (in English).

**Actions**

Medium

Declares measures to prevent child labor, forced labor and human trafficking, but no supporting documentation available

**Information**

The company declares it has implemented actions on child and/or forced labor issues. However, no information was found on this topic in the supporting documentation.

**Guidance**

Some examples of actions on this topic include whistle-blowing procedures to report incidents of child and/or forced labor, company specific awareness & training programs, formal engagement or collaboration with global initiatives, NGOs or local trade unions to prevent child labor, etc.

Low

No information on ISO 45001 certification

**Results**

High

Reporting available on labor and human rights issues, but some material topics are not covered

**Information**

There is some evidence of formal reporting on labor practices or human rights issues in the supporting documentation. It may include key performance indicators (KPIs), or statistical figures. However reporting elements may be limited in terms of quality or quantity, may not cover the main issues, or reporting is not regularly updated.

**Guidance**

Based on the information provided for the assessment, reporting does not cover a major portion of relevant issues. To improve the quality of reporting, KPIs could include injury rates, number of employees covered by social benefits, number of employees trained on discrimination, or the % of employees covered by collective bargaining agreements just to name a few. For more information on examples of specific labor and human rights related KPIs, please refer to the Global Reporting Initiative. Download the How-to Guide on this topic here (in English).

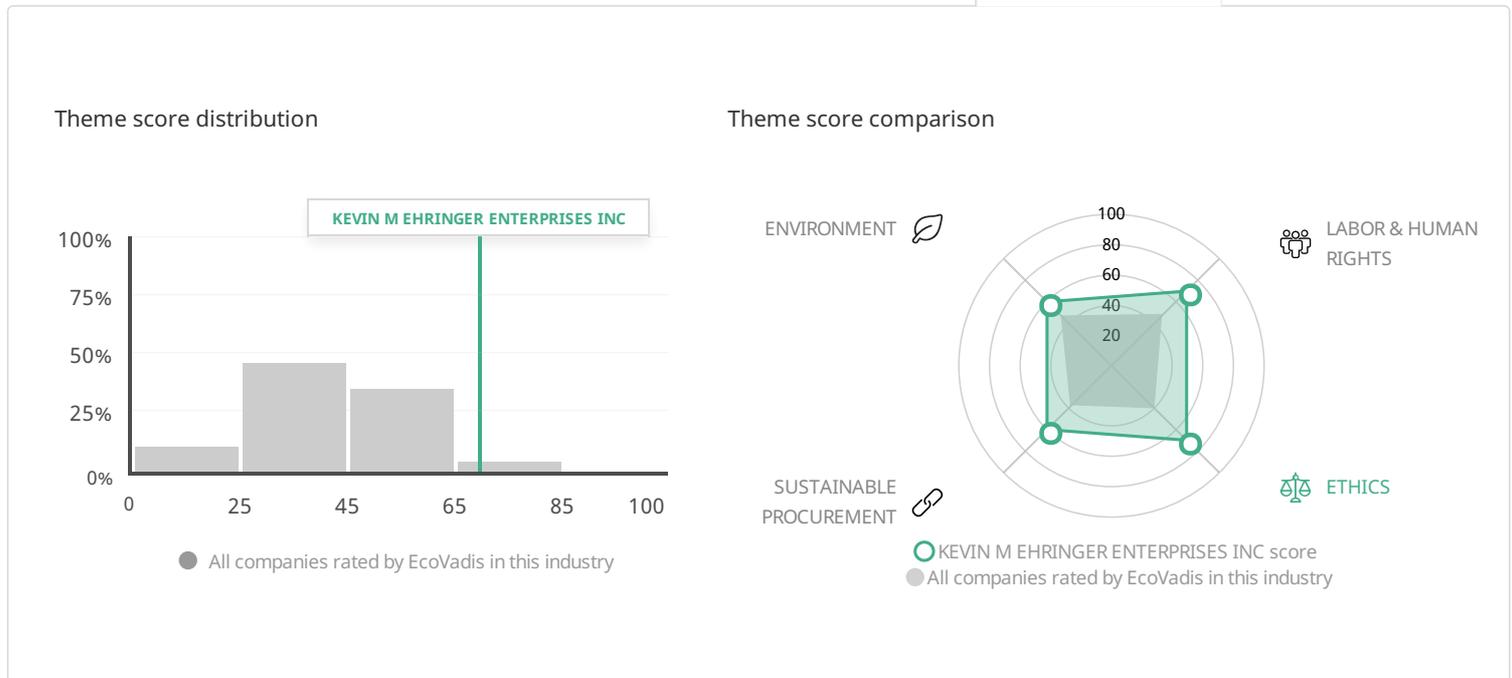
Low

No information related to reporting on average training hours per employee

## 8. ETHICS

This theme focuses primarily on corruption and bribery issues, and also takes into account anticompetitive practices and responsible information management.

### Ethics Score Breakdown



#### Ethics: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Ethics: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

**Strengths (12)**

**Policies**

**Policy on conflict of interest**

**Disciplinary sanctions to deal with policy violations**

**Information**

There is evidence within the supporting documentation provided that the company has implemented structured mechanisms to deal with policy violations such as disciplinary actions.

**Guidance**

In order to ensure the adequate implementation of business ethics policies, companies should establish procedures to administer investigations and sanction employees for eventual violations (i.e. disciplinary measures up to and including possible termination).

**Employee signature acknowledgement of ethics policies**

**Information**

There is evidence within the supporting documentation provided by the company that it is mandatory for employees to sign their acknowledgement of the company's business ethics policies.

**Guidance**

Business ethics policies such as Code of Ethics/Code of Conduct should include a section requiring employees to sign (to ensure that all employees are aware of the policy).

**Policy on information security**

**Information**

The company has issued a formal standard policy that integrates commitments in the form of qualitative objectives on information security issues. The policy is formalized in a document such as a Code of Ethics and includes at least some organizational elements (e.g. review process, dedicated responsibilities, scope of application).

**Guidance**

It is imperative for companies who manage sensitive information to set commitments on the protection and responsible management of third-party data. The security of third party data encompasses the protection of customer personal identification information (PII) and the protection of third party intellectual property rights.

**Policies on corruption**

**Information**

There is a formal policy that integrates qualitative objectives/commitments on anti-corruption & bribery issues (including for example conflict of interest, fraud and money laundering) in the supporting documentation provided by the company.

**Guidance**

Corruption & bribery covers all forms of corruption issues at work namely extortion, bribery, conflict of interest, fraud, money laundering. A comprehensive policy is formalized in a standalone document or is part of a Code of Ethics/Conduct on the issues mentioned and incorporate as well some of the following elements: scope of application, allocation of responsibilities, quantitative objectives, and review mechanisms.

**Comprehensive policies on ethics issues**

**Information**

A comprehensive policy on business ethics issues integrates commitments and/or operational objectives on all or almost all of the main fair business practices issues a company is confronted with: namely corruption & bribery issues, and information security and responsible marketing if applicable. It is also compulsory to have additional elements such as formal mechanism to communicate on business ethics, scope of the policy's application and allocation of responsibilities, among others.

**Guidance**

Policies are deemed exceptional when all business ethics issues are covered by qualitative and quantitative objectives. Additionally, an exceptional policy has exhaustive organizational elements such as allocation of responsibilities, mechanisms to deal with policy violations, formal review process, communication of the policy to all employees and business partners, etc. Download the How-to Guide on this topic here (in English).

**Endorsement of the United Nations Global Compact (UNGC) (at parent company level)**

**Information**

The company's parent company is a Global Compact Signatory.

**Guidance**

The United Nations Global Compact (UNGC) is a voluntary initiative that encourages businesses worldwide to adopt sustainable and socially responsible policies, and to report on them. Global Compact participants commit to respecting 10 principles on human rights, labor rights, the environment and anti-corruption. The initiative has a mandatory disclosure framework, which obliges business participants to annually report on their progress against the 10 principles in a Communication on Progress (COP). Companies that do not comply with this reporting requirement are removed (or "delisted") from the list of participants after two years.

**Actions**

**Incident response procedure (IRP) to manage breaches of confidential information**

**Implementation of a records retention schedule**

**Audits of control procedures to prevent information security breaches**

**Information**

The company's information security policies and compliance mechanisms are regularly audited.

**Guidance**

Internal controls (for examples four-eyes principle, job rotations, among others) are necessary to regularly monitor the effectiveness and proper implementation of actions put in place to support the responsible information management policies. Periodic audits of those controls, done either through an external third party that performs business ethics audits or an internal audit team, are carried out to ensure their effectiveness and provide reasonable assurance that internal processes are being adhered to.

**Awareness training to prevent information security breaches**

**Information**

The company has delivered awareness trainings to employees on information security issues.

**Guidance**

Information management is the process of collecting, storing, managing and maintaining information securely in all its forms. Through the use of rigorous information management practices, companies can help maintain their credibility and confidence of consumers. Awareness or trainings on such practices are regularly conducted to ensure that employees are familiar with the company's information management policy and procedures. They may be conducted either online or in person, and should include regular testing to ensure the training effectiveness.

**Measures to protect third party data from unauthorized access or disclosure**

**Information**

The company has implemented measures to protect customer or client data from unauthorized access or disclosure.

**Guidance**

The company has taken measures to limit access to customer or client data within its own operation, or have implemented measures to secure its information system including such data so as to protect the data from unauthorized access or disclosure.

**Improvement Areas (4)**

**Policies**

Low

Inconclusive documentation for policies on fraud

**Actions**

High

No supporting documentation regarding an effective whistleblower procedure to report ethics issues

**Information**

No company declaration and no evidence within the supporting documentation regarding presence of an effective whistleblower procedure to report business ethics issues within the company's operations.

**Guidance**

A whistleblower procedure is a grievance mechanism for stakeholders to report any wrongdoings, concerns or breaches of the company business ethics policies. An effective whistleblower procedure must provide stakeholders with an identified communication channel to report their concerns, as well as protect the whistleblowers' confidentiality and rights to non-retaliation. The procedure may also be handled by a third party.

High

No supporting documentation regarding an ethics due diligence program on third parties

**Information**

No company declaration and no evidence within the supporting documentation regarding the implementation of systematic compliance and due-diligence measures when dealing with third-party intermediaries (i.e. commission agents, brokers, sales representatives, distributors, contractors, customs brokers, consultants) acting on its behalf.

**Guidance**

Provisions in key international laws hold companies liable for business ethics related misconduct committed in the context of their relationships with third parties (i.e. their agents, consultants, suppliers, distributors, joint-venture partners, or any individual or entity that has some form of business relationship with the organization). Given the risk exposures caused by third-parties, it is important that companies have adequate due diligence procedures in place. Due diligence is the process of gathering independent information to gain an understanding of the risks associated with a third party and visibility of its compliance management systems which address these risks. It can involve background checks and screenings of third party by means of sanction lists, tracking adverse media reports and identifying links to politically exposed persons, assessments of third parties on their own ethics & compliance programs and risk controls. Companies should provide documentation of their procedures that demonstrate how these due diligence efforts are undertaken.

Medium

No supporting documentation regarding awareness trainings on corruption

**Information**

No company declaration and no evidence within the supporting documentation regarding the implementation of awareness or training programs on anti-corruption & bribery issues for employees.

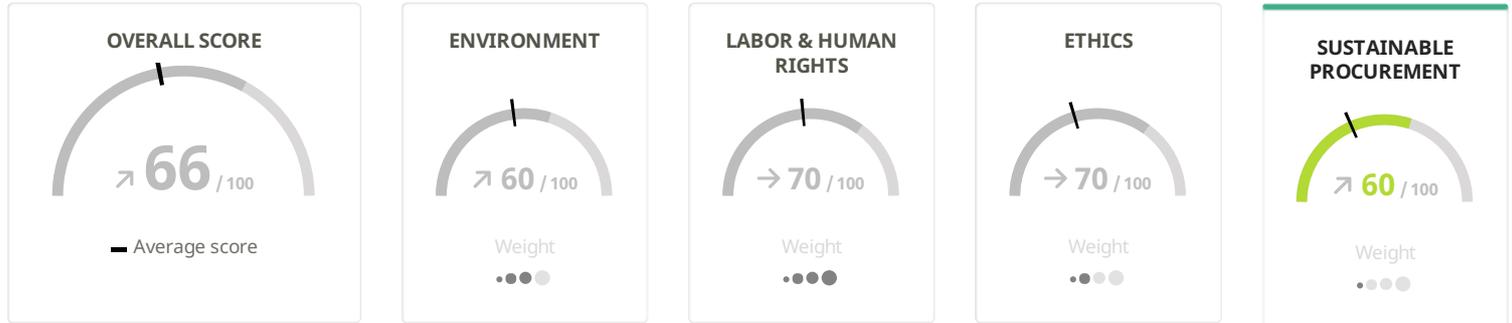
**Guidance**

According to the ISO 26000 guideline, "Corruption can be defined as the abuse of entrusted power for private gain". There are all forms of public and proprietary corruption in the workplaces such as extortion, bribery, conflict of interest, fraud, money laundering. Since corruption undermines a company's effectiveness and ethical reputation, awareness or trainings on anti-corruption & bribery issues are regularly conducted to ensure that employees are familiar with the company's policy and procedures. They may be conducted either online or in person, and should include regular testing to ensure the training effectiveness.

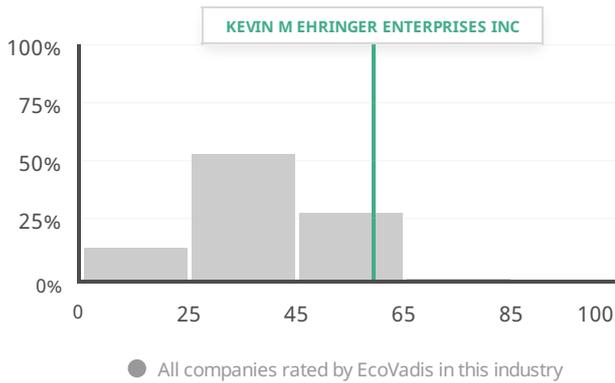
## 9. SUSTAINABLE PROCUREMENT

This theme focuses on both social and environmental issues within the company supply chain.

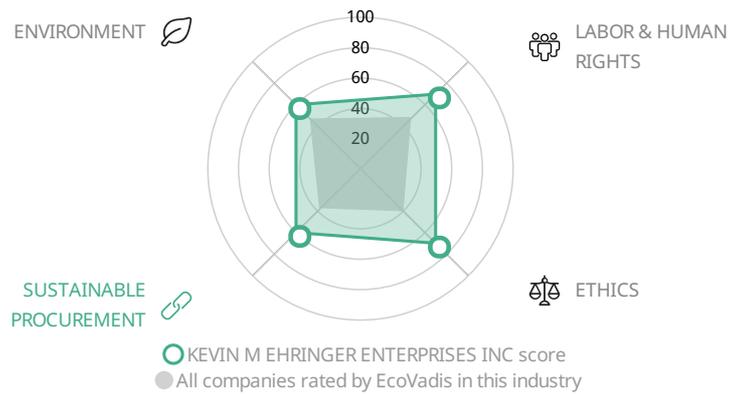
### Sustainable Procurement Score Breakdown



Theme score distribution



Theme score comparison



#### Sustainable Procurement: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

#### Sustainable Procurement: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.



Strengths (4)

Policies

**Sustainable procurement policies on supplier environmental practices**

**Information**

The company has formalized statements, commitments, and operational objectives on the management of its sustainable procurement policies, focusing on some material issues. The existing policy covers environmental issues in the company's supply chain.

**Guidance**

A standard sustainable procurement policy also covers social issues in addition to environmental issues in the supply chain. It also includes commitments and/or operational objectives designed to improve performance or mitigate risk. The policy is communicated to internal and external stakeholders through a formal dedicated document.

Actions

**Supplier sustainability code of conduct in place**

**Information**

The company has issued a specific Supplier Code of Conduct which lists the minimum requirements on environmental, labor and business ethics issues to be followed by its suppliers or subcontractors.

**Guidance**

A supplier Code of Conduct aims to ensure that suppliers provide safe working conditions for their employees, respect fair business ethics practices to comply with rules and regulations and reduce environmental impacts caused by their operations, among other issues. Typically, suppliers are required to uphold the standards in a Code of Conduct in order to continue in a business relationship with their client (i.e. the company undergoing the EcoVadis evaluation).

**Regular supplier assessment (e.g. questionnaire) on environmental or social practices**

**Information**

The company provides evidence in supporting documentation of supplier assessments (in-house, 3rd party, or self-assessments) on environmental (including regulatory issues), social and/or ethical issues.

**Guidance**

Supplier sustainability assessments are an effective way to obtain and validate pertinent information from suppliers on sustainability issues to facilitate a better understanding of supplier performance. These are often requested by the company undergoing the EcoVadis evaluation to their own suppliers. Sustainability supplier assessments can be done through checklists, questionnaires or online forms and can be conducted by the client (undergoing the EcoVadis evaluation), a reliable third party or by the supplier itself. The objectives of such assessments are to identify general and sustainability-related practices as well to help identify high-risk suppliers and the need for further risk mitigation actions.

Results

**Declares using no tin, tantalum, tungsten, gold, and/or their derivatives (Not verified)**

Improvement Areas (5)

**Policies**

**Medium** Inconclusive documentation for policies on supplier social practices

**Information**

The company has either no supporting documentation on social issues in the supply chain, or has provided supporting evidence that was not approved due to quality/acceptance requirements. e.g. company name, recent date (8 years).

**Guidance**

A standard sustainable procurement policy on social issues on the supply chain includes commitments and/or operational objectives designed to improve performance or mitigate risk. It is communicated to internal and external stakeholders through a formal dedicated document.

**Medium** Basic sustainable procurement policies: lacks details on specific issues

**Information**

The company has sustainable procurement policies that may include commitments and operational objectives on the management of its sustainable procurement practices, but lacks details on specific issues.

**Guidance**

A standard sustainable procurement policy includes commitments and/or operational objectives on all material sourcing risks the company faces in its supply chain. It is communicated to internal and external stakeholders through a formal dedicated document. A standard policy contains qualitative objectives/commitments specific to those issues.

**Actions**

**High** No information on social or environmental clauses being included in supplier contracts

**Information**

No company declaration and no evidence within the supporting documentation on the social or environmental clauses being included in supplier contract

**Guidance**

Provisions/clauses in business contracts that cover social & environmental issues which are not directly connected to the subject matter of the specific contract. It's a tool defining the behaviour/setting the expectations and for engaging with suppliers on sustainability. Commercial legal contract between the company and its supplier, usually mention termination of contract when expectations concerning CSR issues are not met.

**High** No information on sustainability risk analysis being conducted (i.e. prior to supplier assessments or audits)

**Information**

No company declaration and no evidence within the supporting documentation on the CSR risk analysis being conducted

**Guidance**

CSR risk mapping allows companies to identify, prevent and reduce social and environmental risks in the supply chain. The company can conduct a CSR risk mapping of its suppliers based on criteria such as procurement category, geographical presence of suppliers and total spend. CSR risk mapping is done before deciding to carry out assessments or audits in order to select which suppliers should receive assessments or audits.

Medium

No information regarding training of buyers on social and environmental issues within the supply chain

**Information**

No company declaration and no evidence within the supporting documentation on the training of buyers on social and environmental issues within the supply chain

**Guidance**

The buyer-supplier relationship plays an important role in improving sustainability in the supply chain. Raising awareness / training of procurement professionals on sustainable purchasing to ensure understanding of social and environmental issues and how to integrate them into their procurement function. For example, procurement professionals can be trained to identify and respond to supply chain risks related to slavery and human trafficking. Evidence of the training conducted can be included in the CSR reports, training presentation slides.

## 10. 360° WATCH FINDINGS

14 December 2021

**No records found for this company on Compliance Database**

null

→ No score impact

360° Watch Findings comprise relevant public information about companies' sustainability practices that have been identified via more than 2,500 data sources (including NGOs, press and trade unions). 360° Watch Findings are incorporated into the EcoVadis assessment and can have positive, negative or no score impact.

### EcoVadis is connected to the following international sources:

- Sustainability networks and initiatives (e.g. AccountAbility, Business for Social Responsibility, CSR Europe)
- Trade unions and employers' organizations
- International organization (e.g. United Nations, European Court of Human Rights, Global Compact, International Labor Organization, World Bank)
- NGOs (e.g. China Labor Watch, Greenpeace, WWF, Movimento Difesa del Cittadino)
- Research institutes and specialized press (e.g. CSR Asia, Blacksmith Institute, Corpwatch)

## 11. SPECIFIC COMMENTS

Additional comments from our analysts pertaining to the assessment.

### Specific comments

-  No records found in third party risk and compliance database.

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-  There is a lack of reporting on KPIs regarding ethics issues.

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-  There is a lack of reporting on KPIs regarding sustainable procurement issues.

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-  There is a lack of information and supporting documents on implementation measures regarding sustainable procurement issues.

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-  The company demonstrates an advanced management system on labor & human rights issues.

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-  The company demonstrates an advanced management system on ethics issues.

## 12. CONTACT US

Any questions or need help? Visit our Help Center at [support.ecovadis.com](https://support.ecovadis.com)

# APPENDIX:

## INDUSTRY RISK PROFILE

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Discover the primary sustainability risks, regulations, hot topics and best practices related to specific industries.

EcoVadis determines industry based on the International Standard Industrial Classification of All Economic Activities (ISIC), which is a compilation of all global economic activities published by the United Nations Statistical Commission. Its main purpose is to provide a set of activity categories that can be utilized for the collection and reporting of statistics according to such activities.

It is possible that a company has operations in more than one industry. In these cases, EcoVadis classifies companies based on their main area of operation, as determined by sustainability risk and/or total revenue.

## CRITERIA ACTIVATION BY THEME:

Discover the primary sustainability risks, regulations, hot topics and best practices related to specific industries.

### Environment

Medium	Energy consumption & GHGs
Medium	Water
Non-activated	Biodiversity
Non-activated	Local & Accidental Pollution
High	Materials, Chemicals & Waste
Non-activated	Product Use
High	Product End-of-Life
Medium	Customer Health & Safety
Non-activated	Environmental Services & Advocacy

### Labor & Human Rights

High	Employee Health & Safety
Medium	Working Conditions
Medium	Social Dialogue
Medium	Career Management & Training
Non-activated	Child Labor, Forced Labor & Human Trafficking
Medium	Diversity, Discrimination & Harassment
High	External Stakeholder Human Rights

### Ethics

Medium	Corruption
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Medium

Anticompetitive Practices

Non-activated

Responsible Information Management

**Sustainable Procurement**



Medium

Supplier Environmental Practices

Medium

Supplier Social Practices

## KEY SUSTAINABILITY ISSUES

Find qualitative explanations of the key sustainability issues and risk associated with Manufacture of wiring and wiring devices



### Environment

Importance

Sustainability issue

Medium

Energy consumption & GHGs

#### Definition

Energy consumption (e.g. electricity, fuel, renewable energies) used during operations and transport. Greenhouse gases direct and indirect emissions including CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFC, PFC and SF<sub>6</sub>. Also includes production of renewable energy by the company.

#### Industry issues

The process of extrusion consumes the largest amount of energy in the manufacturing phase. During extrusion, the process by which wires or strands are sheathed with plastic and insulated, temperatures can reach as high as 200 degrees celsius(1). According to a lifecycle assessment study of wire and cable conducted by the United States Environmental Protection Agency (EPA), it was demonstrated that energy use in the industry is a main driver affecting overall environmental impact; increasing energy efficiency has the ability to affect environmental impact on a whole(1). Additionally, the melting down of Polyvinyl Chloride (PVC) during extrusion can release halogens to the air, which are responsible for ozone depletion. Apart from the machines that carry out the extrusion process, other machines like ones that operate the bobbins that collect wire, also consume large amounts of energy to operate. Improving energy use and limiting the release of ozone depleting substances in the wire and wiring devices industry can be effectively tackled by investing in innovative energy saving technologies, improving the efficiency of processes and by investing in innovative materials like, halogen-free sheathing rather than PVC.

Medium

Water

#### Definition

Water consumption during operations. Pollutants rejected into water.

#### Industry issues

The most ubiquitous purpose for water usage in the manufacture of wiring and wiring devices are for cooling purposes following extrusion processes and cable/wire testing. One best practice techniques to reduce the volume of water consumed during operations include a water re-circulation cooling system. Water use in the industry frequently deposits contaminanats to the water like copper ions, flourine and plasticizer compounds. Pollution of water takes form also from waste emulsion produced; water can be purified and treated by reverse osmosis, a vaccum or by means of ultrafiltration(2). Cooling water re-circulation systems are regarded as a best practice measure conserve water and reduce the amount of waste water rejected.

High

Materials, Chemicals & Waste

**Definition**

Consumption of all types of raw materials and chemicals. Non-hazardous and hazardous waste generated from operations. Also includes air emissions other than GHG (e.g. SOx, NOx).

**Industry issues**

Many hazardous chemicals are used in the jacketing process of the wires; heat stabilizers, flame retardants, halogenated compounds, and polymer systems used in insulation and jacketing. These substances impart electrical insulation, physical stability, and fire performance properties(3,4). These chemicals however, also contain highly toxic substances that can include lead (frequently incorporated as a plasticizer), bromoflorinated fire retardants, heavy metals including cadmium, to name a few(5). Directives like REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) released by the European Union (EU) are already placing restrictions on the use specified chemicals in Europe, for example; restrictions on cadmium and lead were added as part of the REACH directive in April of 2004 which requires that no products contain greater than 0.05% by weight of lead, while cadmium must be completely restricted as an input to PVC (Polyvinyl Chloride)(6,7). The largest portion of hazardous waste produced in the industry involves the waste produced by drawing emulsion – a chemical input used for the lubrication of copper. As the life of the drawing emulsion is limited, the substance can only be disposed of as hazardous waste; companies need to follow suit with adequate hazardous waste handling, storage and disposal procedures. Various different VOCs (Volatile Organic Compounds) are emitted during the process of manufacturing; some of these compounds including n-decane, toluene, isopropyl alcohol, acetone, xylene, methyl ethyl ketone, among others which emissions mainly arise from the industrial application of paints onto wires as well as resin production(8). Releases of VOCs and other emissions can be reduced and controlled by means of scrubbers and other flue gas technologies. Regulations like the aforementioned REACH and the Globally Harmonized Classification System (GHS) are mechanisms in place to ensure chemical safety regarding proper labelling, handling and storage(9). In order to remain competitive, the wire and wiring devices industry will have to remain agile and flexible with respect to the emergences of new regulations that might restrict chemical use.

High

Product End-of-Life

**Definition**

Direct Environmental impacts generated from the end-of-life of the products. These impacts can include hazardous, non-hazardous waste generated, emissions and accidental pollution.

**Industry issues**

In 2002 in the United States alone, copper and copper alloy consumption in electronic equipment produced an estimated 85 billion pounds of waste(10). The disposal of wires are generally an issue due to the lack of resources available to allow the separation of the metal wires and jacketing. The wires are normally retired to India or the Pacific Rim where these countries/zones must take on the financial burden of separating the chemicals contain in the wiring, or worse deal with the environmental and health detriments that come along with certain waste management practices, like incineration or thermoplastic recycling; the former giving rise to potential airborne lead emissions, while the latter is energy intensive and allows for the creation of alternate waste streams(11). The disposal of PVC itself can be detrimental to the atmosphere because of the regular presence of halogenated flame retardants – potent global warming chemicals. To combat the problem of the chemicals contained within the jacketing of the wires at the end of life, the Restriction of Hazardous Substances (RoHS) was a European directive released with the objective of limiting or banning inputs of certain chemicals in products sold in the European Union – this directive has inevitably had an effect on the wiring industry. Companies can work to mitigate negative end-of-life impacts of wiring by implementing design for disassembly or design for recycling measures during stages of R&D.

Medium

Customer Health & Safety

**Definition**

Negative health and safety impacts of products and services on customers or consumers.

**Industry issues**

Since wire jackets of the cables/wires manufactured today comprise of roughly 2-8% of lead, the use of the wires over time can present health risks to consumers in a number of ways(9). As cables/wires age over time, the jacket becomes brittle and the lead migrates to the surface of the wire where it is emitted as dust(5). Wires in the workplace are known to present potential fire hazards as well as wires and cables age. Dust emitted by aging wires can carry quantities of lead, when if ignited or placed to a source of heat, can result in explosive reactions(12). If wire is misused, customers can be exposed to risks of electrocution as well as other fire hazards. Provision of safety guides to customers can work to mitigate the chance of negative events occurring, anticipative measures like call-back procedures in the case of surfacing negative events.



Labor & Human Rights

Importance

Sustainability issue

High

Employee Health & Safety

**Definition**

Deals with health and safety issues encountered by employees at work i.e. during operations and transport. Includes both physiological and psychological issues arising from, among others, dangerous equipment, work practices and hazardous substance.

**Industry issues**

The most significant health hazard for workers in the wire and wiring devices manufacturing industry is exposure to noise. Some of the noisiest processes in factories include wire-drawing and braiding. Manufacturers can implement acoustic enclosures, this is the most effective means by which noise generation can be controlled. Employers should provide personal protective equipment (PPE) to all employees; regular audiometric tests should be conducted to monitor each individual's hearing. Other hazards include exposure to detrimental chemicals, some of which arise from the use of PVC for the jacketing of the wires during production – chemicals include lead and phthalates used as plasticizers(13). To control for exposure employers should have proper ventilation systems installed, as well as the provision of MSDS for employee safety and awareness of the chemicals used on the premises. Other hazards include physical risks presented by machinery (i.e. in wire reeling) as well as the risk of flying particles from machinery (i.e. wire breakage, where wire flies out of the machine); proper guards and PPEs should be provided to employees to mitigate these risks(13).

Medium

Working Conditions

**Definition**

Deals with working hours, remunerations and social benefits granted to employees.

**Industry issues**

The Fifth European Working Conditions survey performed in 2010 shows that overall, 18% of workers in the EU27 are not satisfied with their work-life balance. The wire and wiring industry does not face specific severe issue in addition to standard working conditions applicable to any activity (e.g. working hours, holidays, wages and benefits). Nevertheless, as in all manufacturing sectors, employee time schedules should encompass a minimum amount of flexibility and compensate atypical working hours.

Medium

Social Dialogue

**Definition**

Deals with structured social dialogue i.e. social dialog deployed through recognized employee representatives and collective bargaining.

**Industry issues**

The Global poll 2012 led by the International Trade Union Confederation (ITUC)(14) shows that 70% of workers from 13 countries worldwide think current labor laws provide inadequate legal protection on wages, and 44% think the legal framework does not ensure reasonable working hours. A sound and structured social dialog is thus of importance especially in a context of medium or low skilled workforce, like in the manufacturing industry of wiring and wiring devices.

Medium

Career Management & Training

**Definition**

Deals with main career stages i.e. recruitment, evaluation, training and management of layoffs.

**Industry issues**

A strong workforce provides the basis for a successful company. In order to foster their commitment, wiring companies must continually invest in training and development of their employees via skill development and robust career development programs.

Medium

Diversity, Discrimination & Harassment

**Definition**

Deals with discrimination and harassment prevention at the workplace. Discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, termination; based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age. Harassment may include physical, psychological and verbal abuse in the work environment.

**Industry issues**

Diversity at work is a key issue to any company. It is addressed by specific regulations in most countries, in addition to sectorial and national initiatives aimed to address this issue. Managers in the manufacture of wires and wiring devices industry, as well as in any other industry, have to be careful with respect to cases of gender discrimination as well as discrimination against handicapped workers.

High

External Stakeholder Human Rights

**Definition**

Deals with the prevention of direct and indirect human rights impacts of the companys operations on external stakeholders. External stakeholder human rights include any of the inherent rights outlined in the UN Universal Declaration on Human Rights, such as rights to property/land, rights to self-determination, rights to safety/security etc.

**Industry issues**

Respect for human right at work is a basic principle mentioned by several initiatives such as the Universal Declaration of Human Rights, the ILO principles or the Global Compact principles. It is an issue applicable in the manufacture of wire and wiring devices industry with targeted operations in risk countries.



Ethics

Importance

Sustainability issue

Medium

Corruption

**Definition**

Deals with all forms of corruption issues at work, including among other things extortion, bribery, conflict of interest, fraud, money laundering.

**Industry issues**

Corruption and bribery issues are major issues for any company, particularly when operating in risk countries. Regulations such as the FCPA (Foreign Corrupt Practice Act) in the United States or the U.K. Bribery Act address these issues and make it unlawful to make payments to foreign government officials to assist in obtaining or retaining business.

Medium

Anticompetitive Practices

**Definition**

Deals with anti-competitive practices including among others: bid-rigging, price fixing, dumping, predatory, pricing, coercive monopoly, dividing territories, product tying, limit pricing, and the non respect of intellectual property.

**Industry issues**

Anti-competitive practices such as collusions, price dumping, coercive monopolies represent a significant risk for companies in the manufacture of wires and wiring devices sector. Major condemnations have been made by the European Union (EU) or the United States of America (USA) regarding cartels and price fixing in various large companies within the wiring industry.



Sustainable Procurement

Importance

Sustainability issue

Medium

Supplier Environmental Practices

**Definition**

Deals with environmental issues within the supply chain i.e. environmental impacts generated from the suppliers and subcontractors own operations and products.

**Industry issues**

Virgin materials are almost always used in the production of IT cables since used wires are generally difficult to recycle. Moreover, used materials lack an adequate level of purity in order to be used as raw material inputs capable of effectively transmitting electrical currents or information(15). Much of the environmental/supplier issues arising from this sector arise from the extraction of copper, smelting of the copper, manufacturing of the wires and hazardous chemicals/materials used(16). The manufacturing process of copper begins with the extraction of ore and then proceeds through a series of industrial processes to produce copper metal; the process energy for manufacturing both virgin and recycled copper wire also includes a winding processes. Energy is required to obtain ore, operate ore processing equipment, and to extract and process the fuels used in the manufacturing process. Process energy to manufacture one ton of copper wire from virgin and recycled raw material is 122.

Medium

Supplier Social Practices

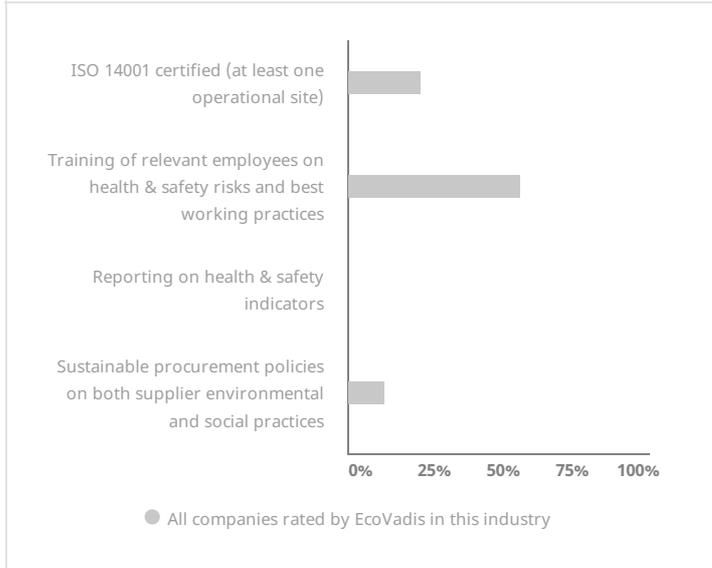
**Definition**

Deals with labor practices and human rights issues within the supply chain i.e. labor practices and human rights issues generated from the suppliers and subcontractors own operations or products.

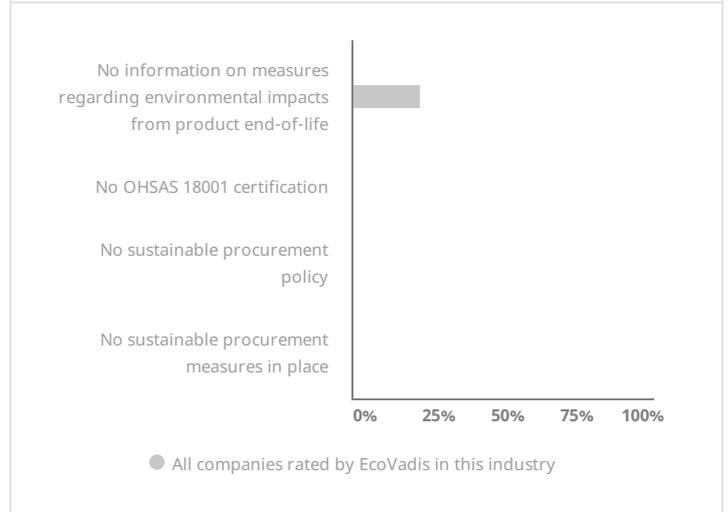
**Industry issues**

Social issues in the supply chain can have a major impact on the company image as several instances have surfaced in the past few years (e.g. Nike, Apple). As copper is a major input for the manufacture of wire and wiring devices industry, issues pertaining to conflict minerals are ever relevant. Countries rich in minerals like copper, for example, are often marred with corruption, militarization, war and authoritarian repression. In 2012, the U.S. Securities and Exchange Commission (SEC) adopted a rule requiring new disclosures from public companies in regards to their use of conflict minerals; making reporting a requirement for companies. Other social issues that may arise in the supply chain include employee health and safety, considering that a good portion of suppliers are involved in metal refinery or casting. Confirming compliance with basic labour requirements through CSR assessments or audits is one of the ways to mitigate the social side of supply chain risks.

### Key industry Strengths



### Key industry Improvement Areas



Sustainability KPIs Overview

KPI	All companies rated by EcoVadis in this industry
<b>Active whistleblowing procedure in place</b>	36%
<b>Audit or assessment of suppliers on CSR issues</b>	29%
<b>Carbon disclosure project (CDP) respondent</b>	6%
<b>Global Compact Signatory</b>	10%
<b>ISO 14001 certified (at least one operational site)</b>	31%
<b>OHSAS 18001/ISO 45001 certification or equivalent (at least one operational site)</b>	20%
<b>Policy on sustainable procurement issues</b>	23%
<b>Reporting on energy consumption or GHGs</b>	29%
<b>Reporting on health &amp; safety indicators</b>	23%

## Main Regulations and Initiatives

### EU WEEE Directive

[http://ec.europa.eu/environment/waste/weee/index\\_en.htm](http://ec.europa.eu/environment/waste/weee/index_en.htm)

 Regulatory

Waste Electrical and Electronic Equipment Directive (WEEE Directive)

 Environment

### EU regulation REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals)

<http://echa.europa.eu/regulations/reach>

 Regulatory

REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry. It also promotes alternative methods for the hazard assessment of substances in order to reduce the number of tests on animals.

 Environment

### Standard ISO 14000 (International Standard Organisation)

[http://www.iso.org/iso/iso\\_14000\\_essentials](http://www.iso.org/iso/iso_14000_essentials)

The ISO 14000 family addresses various aspects of environmental management. It provides practical tools for companies and organizations looking to identify and control their environmental impact and constantly improve their environmental performance.

 Environment

### International Labor Organization's Fundamental Conventions

[http://www.ilo.org/wcmsp5/groups/public/--ed\\_norm/--declaration/documents/publication/wcms\\_095895.pdf](http://www.ilo.org/wcmsp5/groups/public/--ed_norm/--declaration/documents/publication/wcms_095895.pdf)

 Regulatory

The Governing Body of the International Labour Office has identified eight Conventions as fundamental to the rights of human beings at work. These rights are a precondition for 12 the others in that they provide a necessary framework from which to strive freely for the improvement of individual and collective conditions of work.

 Labor & Human Rights

### Foreign Corrupt Practices Act of 1977

<http://www.usdoj.gov/criminal/fraud/fcpa/>

 Regulatory

The Foreign Corrupt Practices Act of 1977 (FCPA) prohibits payments, gifts, or Practices Act contributions to officials or employees of any foreign government or government-owned business for the purpose of getting or retaining business.

 Ethics

### EU directive RoHS (Restriction of Hazardous Substances)

[http://ec.europa.eu/environment/waste/rohs\\_eee/index\\_en.htm](http://ec.europa.eu/environment/waste/rohs_eee/index_en.htm)

 Regulatory

The RoHS directive restricts the use of six hazardous materials in the manufacture of various types of electronic and electrical equipment.

 Environment

### EPA Design for the Environment Partnership Program

<http://www.epa.gov/dfe/pubs/projects/wire-cable/index.htm>

Helps consumers, businesses, and institutional buyers identify cleaning and other products that perform well, are cost-effective, and are safer for the environment.

 Environment

### Universal Declaration of Human Rights

<http://www.un.org/Overview/rights.html>

 Regulatory

The Universal Declaration of Human Rights (UDHR) is an advisory declaration adopted by the United Nations General Assembly (10 December 1948 )

 Labor & Human Rights

### Standard OHSAS 18001 (Occupational Health and Safety Assessment Series)

<http://www.ohsas-18001-occupational-health-and-safety.com/index.htm>

OHSAS 18000 is an international occupational health and safety management system specification.

 Labor & Human Rights

### United Nations Convention against Corruption (UNCAC)

<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

 Regulatory

The UNCAC is the first leg12y binding international anti-corruption instrument. In its 8 Chapters and 71 Articles, the UNCAC obliges its States Parties to implement a wide and detailed range of anti-corruption measures affecting their laws, institutions and practices.

 Ethics

**United Nations Global Compact (10 principles)**

<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of ten principles in the areas of human rights, labour standards, the environment, and anti-corruption:

**All themes**

**Standard Global Reporting Initiative's (GRI)**

<http://www.globalreporting.org/Home>

The GRI is a network-based organization, that has set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance.

**All themes**

**Carbon disclosure project**

<https://www.cdp.net>

CDP is an international, not-for-profit organization providing the only global system for companies and cities to measure, disclose, manage and share vital environmental information.

**Environment**

**OECD guidelines for multinational enterprises**

[http://www.oecd.org/about/0,2337,en\\_2649\\_34889\\_1\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/about/0,2337,en_2649_34889_1_1_1_1_1,00.html)

The Guidelines are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide voluntary principles and standards for responsible business conduct in a variety of areas including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition, and taxation.

**All themes**

**Standard ISO 26000 (International Standard Organisation)**

<http://www.iso.org/iso/pressrelease.htm?refid=Ref972>

The future International Standard ISO 26000, Guidance on social responsibility, will provide harmonized, glob12y relevant guidance based on international consensus among expert representatives of the main stakeholder groups and so encourage the implementation of best practice in social responsibility worldwide.

**All themes**

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