

Rank	Company	Corporate Anti-Corruption Policies	Global Compact	Measures	Practices	Implementation Mechanisms	Source(s)	Link	Comments
1	Wal-Mart Stores	Yes		Anti-Corruption and Bribery Policy, Prevention of Corrupt Payments and Money-Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Statement of Ethics, Global Ethics Office	Statement of Ethics	http://walmartstores.com/download/2032.pdf	
2	Exxon Mobil	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Standards of Business Conduct	2007 Corporate Citizenship Report Standards of Business Conduct	http://www.exxonmobil.com/Corporate/files/Corporate/community_ccr_2007.pdf http://www.exxonmobil.com/corporate/about_operations_sbc.aspx	
3	Royal Dutch Shell	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Fraud and Money Laundering and Financing Terrorism, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Office	Sustainability Report 2007 Shell Code of Conduct	http://www-static.shell.com/static/responsible_energy/downloads/sustainability_reports/shell_sustainability_report_2007.pdf http://www-static.shell.com/static/aboutshell/downloads/who_we_are/code_of_conduct/english.pdf	
4	BP	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Illegal Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Group Compliance & Ethics Officer	Code of Conduct Bribery and Corruption Statement	http://www.bp.com/liveassets/bp_internet/globalbp/STAGING/global_assets/downloads/C/coc_en_full_document.pdf http://www.bp.com/sectiongenericarticle.do?categoryId=9021690&contentId=7042412	
5	Toyota Motor	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing	Code of Conduct	Frequently asked Questions about CSR Sustainability Report 2008	http://www.toyota.co.jp/en/csr/faq/ http://www.toyota.co.jp/en/csr/report/08/download/pdf/sustainability_report08.pdf	
6	Chevron	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Business Conduct and Ethics Code	2007 Corporate Responsibility Report Business Conduct and Ethics Code	http://chevron.com/globalissues/corporateresponsibility/2007/documents/Chevron_CR_report_050208.pdf http://www.chevron.com/documents/pdf/chevronbusinessconductethicscode.pdf	
7	ING Group	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Group Compliance Officer, Business Principles	2007 Corporate Responsibility Performance Report Statement of Business Principles The Dutch Corporate Governance Code	http://www.ing.com/cms/idc.cgi_isapi.dll?IdcService=GET_FILE&dDocName=314657_EN&RevisionSelectionMethod=latestReleased http://www.ing.com/cms/idc.cgi_isapi.dll?IdcService=GET_FILE&dDocName=074046_EN&RevisionSelectionMethod=latestReleased http://www.ing.com/cms/idc.cgi_isapi.dll?IdcService=GET_FILE&dDocName=102296_EN&RevisionSelectionMethod=latestReleased http://www.ing.com/cms/idc.cgi_isapi.dll?IdcService=GET_FILE&dDocName=311398_EN&RevisionSelectionMethod=latestReleased	
8	Total	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing	Code of Conduct, Ethics Committee	2007 Corporate Responsibility Performance Report Combating bribery and corruption Code of Conduct Accounting Treatment, Internal Control and Audits	http://www.total.com/static/en/medias/topic1606/TOTAL_csr_en_2007.pdf http://www.total.com/en/corporate-social-responsibility/Ethical-Business-Principles/bribery-corruption/bribery-corruption_9124.htm http://www.total.com/static/en/medias/topic1608/Code_Conduct_Contracts2.pdf http://www.total.com/en/corporate-social-responsibility/Ethical-Business-Principles/formal-commitments-actions/accounting-treatment_15839.htm	
9	General Motors	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics and Conflicts of Interest	2005/ 06 Corporate Responsibility Report Values and Guidelines for Employees Conduct	http://www.gm.com/corporate/responsibility/reports/06/PDF/Full_Report_final.pdf http://www.gm.com/corporate/investor_information/docs/corp_gov/wwi.pdf	
10	ConocoPhillips	Yes		Anti-Corruption and Bribery Policy, Kickback Prevention, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Ethics and Conduct	2006 Sustainable Development Report Code of Ethics Booklet	http://www.conocophillips.com/NR/rdonlyres/B19C00AC-6154-4729-9AE1-9EBDEF19262A/0/2006_CoP_Sustain.pdf http://www.conocophillips.com/NR/rdonlyres/1AD2CCD6-7C37-4FB0-864B-8371C1FA0395/0/CodeofEthicsBooklet1107.pdf	
11	Daimler	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Integrity Code, Corporate Compliance Department, Compliance Manager, Chief Compliance Officer	Integrity Code Code of Ethics	http://www.daimler.com/Projects/c2c/channel/documents/1557761_daimler_sust_2008_reports_sustainabilityreport2008facts_en.pdf http://www.daimler.com/Projects/c2c/channel/documents/1031150_dcx_corp_2007_docs_integritycode_e.pdf http://www.daimler.com/Projects/c2c/channel/documents/1069927_20071217_Code_of_Ethics.pdf	
12	General Electric	Yes		Anti-Corruption and Bribery Policy, Prevention of Money-Laundering and Improper Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Ombudsperson, Code of Ethics	Citizenship Report 2007-2008 The Spirit & The Letter	http://www.ge.com/files_citizenship/pdf/GE_07_08_Citizenship_Report.pdf http://www.ge.com/files_citizenship/pdf/TheSpirit&TheLetter.pdf	
13	Ford Motor	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	2007/ 08 Sustainability Report Code of Conduct Handbook	http://www.ford.com/doc/sr07-ford-sustainability.pdf http://www.ford.com/doc/corporate_conduct_standards.pdf	
14	Fortis	Yes	GC	Anti-Bribery Policy, Prevention of Money Laundering	Giftmanagement, Disciplinary Action	Code of Conduct	Fortis Principles of Business Conduct	http://www.fortis.com/sustainability/media/pdf/PrinciplesEN.pdf	
15	AXA	Yes	GC	Anti-Bribery Policy, Prevention of Kickbacks, Improper Payments and Money Laundering	Whistleblowing, Giftmanagement, Disciplinary Action	Compliance and Ethics Guide	Compliance and Ethics Guide	http://www.axa.com/lib/en/uploads/refdoc/compliance/AXA_Compliance_Guideb.pdf	
16	Sinopec	Yes	GC	Anti-Corruption Policy, Employees Education	Whistleblowing	n/a	2007 Sustainable Development Report	http://english.sinopec.com/download_center/reports/2007/20080717/download/SustainReport2007en.pdf	
17	Citigroup	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Code of Conduct	http://www.citigroup.com/citi/corporategovernance/data/codeconduct_en.pdf?ieNocache=732	
18	Volkswagen	Yes	GC	Anti-Corruption and Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Ombudsman System, Anti-Corruption Officer	Avoiding conflicts of interest and corruption	http://www.volkswagenag.com/vwag/vwcorp/info_center/en/publications/2007/09/sustainability_report-bin.acq/qual-BinaryStorageItem.Single.File/sustainability_report_07-08_engl.pdf http://www.volkswagen.de/etc/medialib/vwcms/virtualmaster/de/Unternehmen/mobilitaet_und_nachhaltigkeit/downloads/corporate_governance.Par.0010.File.pdf/company_directive.pdf	
19	Dexia Group	Yes	GC	Prevention of Money Laundering and Financing of Terrorism	n/a	n/a	General Principles in the Fight against Money Laundering and the Financing of Terrorism	http://www.dexia.com/docs/2007/2007_audit/20070713_general_statement_UK.pdf	
20	HSBC Holdings	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism	n/a	Group Standards Manual	Preventing Financial Crime	http://www.hsbc.com/1/2/sustainability/reports/preventing-financial-crime	
21	BNP Paribas	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering and Terrorism Financing and Fraud, Employees Training	n/a	Code of Conduct, Chief Executive Officer of Group Compliance, Compliance Committee	Report on Environmental and Social Responsibility 07	http://www.bnpparibas.com/en/sustainable-development/pdf/RSE+GB+07.pdf	

22	Allianz	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Compliance Department	Sustainable Development Summary Report 2008 Code of Conduct for Business Ethics and Compliance	http://www.allianz.com/en/about_allianz/sustainability/media/downloads/2008_status_report.pdf http://www.allianz.com/en/allianz_group/sustainability/media/downloads/allianz_se_coc_engl.pdf
23	Crédit Agricole	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Giftmanagement	Compliance Charter, Compliance Officer	Sustainable Development - The 2007 Compendium	http://www.credit-agricole.com/sustainabledevelopment/sd/pdf/CAG021_IDD08_VA_PDF1_190508.pdf
24	State Grid	Yes	GC	Anti-Corruption and Bribery Policy	Giftmanagement, Disciplinary Action	Code of Conduct	Corporate Social Responsibility Report 2007	http://www.sgcc.com.cn/ywlm/responsibility/2007.pdf
25	China National Petroleum	Yes		Anti-Corruption Policy, Employees Training	Disciplinary Action	n/a	Social Responsibility Report 2007	http://www.cnpc.com.cn/Resource/eng/img/07%20CSR%20Report/CNPC%20CSR%20Report%202007.pdf
26	Deutsche Bank	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics for Senior Financial Officers, Deutsche Bank Code of Conduct for Staff	Corporate Social Responsibility Report 2007 Deutsche Bank Code of Conduct for Staff	http://www.db.com/csr/en/download/CSR_Report_2007_FINAL_050608.pdf http://www.db.com/ir/en/download/Code_of_Conduct_Oct2005_EN.pdf
27	ENI	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics	Sustainability Report 2007 Code of Ethics Corruption Fighting Whistleblowing	http://www.eni.it/attachments/publications/corporate-esponsability/general/sustainability-report-2007.pdf http://www.eni.it/en_IT/attachments/sostenibilita/sost-imp/codice-etico-ita-eng-23-10-08.pdf http://www.eni.it/en_IT/sustainability/governance-ethics/code/corruption/corruption.shtml http://www.eni.it/en_IT/sustainability/governance-ethics/code/whistleblowing/whistleblowing.shtml
28	Bank of America Corp.	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics, Ethics Oversight Committee	Code of Ethics	http://media.corporate-ir.net/media_files/irol/71/71595/COE_Jan08.pdf
29	AT&T	Yes	n/a		Whistleblowing, Disciplinary Action	Code of Ethics	Code of Ethics Reporting of Accounting, Internal Accounting Controls or Auditing Complaints or Concerns	http://www.att.com/gen/investor-relations?pid=5595 http://www.att.com/gen/investor-relations?pid=5621
30	Berkshire Hathaway	Yes		Anti-Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	Code of Ethics	http://www.berkshirehathaway.com/govern/ethics.pdf
31	UBS	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics	Annual Report 2007 (Part 1) Code of Business Conduct and Ethics	http://www.ubs.com/1/ShowMedia/investors/annualreporting?contentId=137530&name=AR07_SPR_EN.pdf http://www.ubs.com/1/ShowMedia/investors/corporategovernance/business_conduct?contentId=152516&name=Code%20of%20Business%20Conduct%20and%20Ethics%20of%20UBS.pdf
32	J.P. Morgan Chase & Co.	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer, Compliance Department	Corporate Responsibility Report 07 Code of Conduct	http://www.jpmorganchase.com/pdfdoc/jpmc/corresp/jpmc_crr07.pdf http://www.jpmorganchase.com/pdfdoc/jpmc/governance/wrrt.pdf
33	Carrefour	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing	Code of Ethics	2007 Sustainability Report	http://www.carrefour.com/docroot/groupe/C4com/Commerce%20responsable/Publications/RDD%202007%20GB.pdf
34	Assicurazioni Generali	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Whistleblowing, Disciplinary Action	Ethical Code	Sustainability Report 2007 Ethical Code	http://www.generali.com/BilancioSost/eng/BS_eng_col/Generali_SR_col_full_72.pdf http://www.generali.com/generalicom/media/show710395
35	American International Group	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Code of Conduct	http://media.corporate-ir.net/media_files/irol/76/76115/AIGoconduct.pdf
36	Royal Bank of Scotland	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	2007 Corporate Responsibility Report Code of Conduct	http://www.rbs.com/content/corporate_responsibility/downloads/2007_cr_report.pdf http://www.rbs.com/content/corporate_responsibility/employee_practices/downloads/RBS_Group_Code_Conduct.pdf
37	Siemens	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Business Conduct Guidelines, Chief Compliance Officer, Ombudsman	Corporate Responsibility Report 2007 Business Conduct Guidelines	http://w1.siemens.com/responsibility/report/07/pool/pdf/cr_report_2007_e_internetversion.pdf http://w1.siemens.com/responsibility/report/07/pool/compliance/business_conduct_guidelines_e.pdf
38	Samsung Electronics	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement	Samsung Electronics Global Code of Conduct	2008 Samsung Electronics Sustainability Report Ethics Management	http://www.samsung.com/us/aboutsamsung/citizenship/download/2008_SustainabilityReport_Eng.pdf http://www.samsung.com/us/aboutsamsung/corpcitizenship/environmentalsocialreport/environmentalsocialreport_EthicsManagement.html
39	ArcelorMittal	Yes	GC	Anti-Corruption Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct	Corporate Responsibility Report 2007 Code of Business Conduct Whistleblower	http://www.arcelormittal.com/rls/data/upl/720-3-0-CorporateResponsibilityReport-LowResolution070708.pdf http://www.arcelormittal.com/index.php?lang=en&page=485 http://www.arcelormittal.com/index.php?lang=en&page=566
40	Honda Motor	Yes	n/a		Whistleblowing, Giftmanagement	Conduct Guideline, Business Ethics Committee, Compliance Officer	Conduct Guideline CSR Report 2008	http://world.honda.com/conductguideline/ http://world.honda.com/CSR/pdf/2008/e_csr08_all.pdf
41	Hewlett-Packard	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Standards of Business Conduct, Chief Ethics and Compliance Officer	Global Citizenship Report for FY 2007 Standards of Business Conduct	http://www.hp.com/hpinfo/globalcitizenship/gcreport/pdf/hp_fy07_gcr.pdf http://www.hp.com/hpinfo/globalcitizenship/csr/sbcbrochure.pdf
42	Pemex	Yes	GC	Anti-Corruption Policy	n/a	Code of Conduct and Ethics	2007 Sustainable Development Report	http://desarrollosustentable.pemex.com/files/content/informes_docs/informe07/english/ids07_english.pdf
43	Société Générale	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing of Terrorism, Employees Training	Giftmanagement	Code of Conduct, Compliance Officer	2007 Focus on Corporate Social Responsibility The Current Compliance Structure Code of Conduct	http://www.socgen.com/rse/Data/pdf/Focus_2007.pdf http://www.socgen.com/csr/sustainable_development/compliance.html http://www.socgen.com/csr/Data/pdf/Code_conduite.pdf
44	McKesson	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics	Corporate Citizenship Report 2007 Code of Business Conduct and Ethics	http://www.mckesson.com/static_files/McKesson.com/Common_Documents/citizenship_reportmck.final.pdf http://www.mckesson.com/static_files/McKesson.com/CorpCommunity/mckesson_code_of_conduct.pdf
45	HBOS	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering	Whistleblowing	n/a	2007 Corporate Responsibility Report	http://www.hbosplc.com/community/HBOS%202007%20Corporate%20Responsibility%20Report.pdf
46	International Business Machines	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Business Conduct Guidelines	2007-2008 Corporate Responsibility Report Business Conduct Guidelines	http://www.ibm.com/ibm/responsibility/ibm_crr_downloads/pdf/full_0708_ibm_crr.pdf http://www.ibm.com/investor/pdf/BCG2009.pdf
47	Gazprom	No						No information displayed on Homepage

48	Hitachi	Yes	GC	Anti-Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	The Corporate Ethics and Compliance Handbook, Compliance Officer	Corporate Social Responsibility Report 2007 The Corporate Ethics and Compliance Handbook	http://www.hitachi.com/csr/csr_images/csr2008e.pdf http://www.hitachi.com/csr/csr_images/handbook_en.pdf
49	Valero Energy	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics	Code of Business Conduct and Ethics	http://www.valero.com/NR/rdonlyres/67FCC27E-E79D-4FC4-894C-B5848066B105/0/CodeofBusinessConductandEthics.pdf
50	Nissan Motor	Yes	GC	Employees Training	Whistleblowing	Code of Conduct	Sustainability Report 2008	http://www.nissan-global.com/EN/DOCUMENT/PDF/SR/2008/SR2008_E_all.pdf
51	Tesco	No						No information displayed on Homepage
52	E.ON	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Business Compliance Officer	Corporate Responsibility 2007 Code of Conduct Corruption Statement	http://www.eon.com/en/downloads/EON_CR_US.pdf http://www.eon.com/en/downloads/Code_of_Conduct.pdf http://www.eon.com/en/unternehmen/21397.jsp
53	Verizon Communications	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, VZ Ethics	2007 Verizon Corporate Responsibility Report Code of Conduct	http://70.32.120.177/images/vz_uploads/verizon_cr_report_2007.pdf https://www2.verizon.com/about/careers/pdfs/CodeOfConduct.pdf
54	Nippon Telegraph & Telephone	Yes		Employees Training	Whistleblowing	NTT Group Corporate Ethics Charter	CSR Report 2008	http://www.ntt.co.jp/csr_e/2008report/download/pdf/all.pdf
55	Deutsche Post	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Improper Payments and Money Laundering, Employees Training	Giftmanagement, Whistleblowing	Code of Conduct, Global Values Office	Sustainability Report 2008 Code of Conduct UN Global Compact - Communication on Progress (COP) 2008	http://www.dpwn.de/sustainabilityreport/2008/servicepages/downloads/files/download.php?file=entire_dp_csr08.pdf http://www.dpwn.de/dpwn?tab=1&skin=hi&check=yes&lang=de_EN&mlFile=2007549 http://csr.dpwn.bericht.geber.at/sustainabilityreport/2008/servicepages/downloads/files/un_global_impact_dp_csr08.pdf
56	Metro	Yes		Training on compliance with the Business Principles for employees	Giftmanagement, Whistleblowing	Compliance Program, Compliance Officers	Business Principles for Employees of METRO AG METRO Group Compliance Program	http://logging.mgi.de/ObjectTracking/www.metrogroup.de/servlet/PB/show/1150520/Unternehmen-Compliance-Geschaeftsgrundsaeetze-en.pdf http://www.metrogroup.de/servlet/PB/menu/1138270_I2_ePRJ-METRODE-MAINPAGE/index.html
57	Nestlé	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Corporate Business Principles, Group Compliance Committee	Code of Conduct	http://www.nestle.com/Resource.axd?id=91079B30-575B-4DCA-A3F6-566FD5C67683
58	Santander Central Hispano Group	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money-Laundering and Financing Terrorism, Employees Training	Giftmanagement, Disciplinary Action	General Code of Conduct	Sustainability Report 2007 General Code of Conduct	http://santander.com/cs/gstaticBS?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1205443735862&cachecontrol=immediate&ssbinary=true&maxage=3600 http://santander.com/cs/gstaticBS?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1195356218865&cachecontrol=immediate&ssbinary=true&maxage=3600
59	Statoil Hydro	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Ethics Code of Conduct, Corporate Compliance Officer	Sustainable development 2007 Ethics Code of Conduct Transparency and Anti-Corruption Statement Ethics Helpline	http://www.statoilhydro.com/en/EnvironmentSociety/Sustainability/Downloads/Paper%20report.pdf http://www.statoilhydro.com/en/AboutStatoilHydro/EthicsValues/Downloads/Ethics%20code%20of%20conduct.pdf http://www.statoilhydro.com/en/EnvironmentSociety/Society/Pages/TransparencyAndAnti-Corruption.aspx http://www.statoilhydro.com/en/AboutStatoilHydro/EthicsValues/Pages/EthicsHelpline.aspx
60	Cardinal Health	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Standards of Business Conduct, Compliance Officer, Ethics and Compliance Department	Standards of Business Conduct Ethics and Compliance Statement Code of Business Conduct and Ethics Policy on Reporting of Concerns	http://www.cardinalhealth.com/us/en/aboutus/what/ethics/attachments/StandardsofBusinessConduct.pdf http://www.cardinalhealth.com/us/en/aboutus/what/ethics/index.asp http://www2.goldmansachs.com/our-firm/investors/corporate-governance/corporate-governance-documents/code-of-business-conduct-ethics.pdf http://www2.goldmansachs.com/our-firm/investors/corporate-governance/corporate-governance-documents/reporting-of-concerns.pdf
61	Goldman Sachs Group	Yes	GC	n/a	Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics		
62	Morgan Stanley	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics and Business Conduct, The Morgan Stanley Code of Conduct, Compliance Department	The Morgan Stanley Code of Conduct Code of Ethics and Business Conduct	http://www.morganstanley.com/about/company/governance/pdf/FinalCode2008.pdf http://www.morganstanley.com/about/company/governance/pdf/Code_of_Ethics_062008.pdf
63	Petrobras	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Ombudsman	Social and Environmental Report 2007 Code of Ethics Ombudsman - Policies and Guidelines Ombudsman - Questions	http://www2.petrobras.com.br/ResponsabilidadeSocial/ingles/pdf/BSA2007_ing.pdf http://www2.petrobras.com.br/Petrobras/ingles/pdf/CodEticalng.pdf http://ouvidoria.petrobras.com.br/PaginaDinamica.asp?Grupo=498&Publicacao=3088&WT=1&ID_SITE=Petrobras+System+Ombudsman+Policies+and+Guidelines-3088&ID_TIPO=P http://ouvidoria.petrobras.com.br/PaginaDinamica.asp?Grupo=501&WT=1&ID_SITE=Questions-501&ID_TIPO=G
64	Deutsche Telekom	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering	Disciplinary Action, Whistleblowing	Code of Conduct, Compliance Committee, Chief Compliance Officer	The 2008 Corporate Responsibility Report Code of Conduct Code of Conduct Violations	http://www.download-telekom.de/dt/StaticPage/58/52/58/2008_DTAG_Corporate%20Responsibility.pdf_585258.pdf http://www.download-telekom.de/dt/StaticPage/28/90/dtag_code_of_conduct_en_28908.pdf http://www.telekom.com/dtag/cms/content/dt/unethicsline
65	Home Depot	Yes		Anti-Corruption Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Business Code of Conduct and Ethics, Corporate Compliance Department	Business Code of Conduct and Ethics	http://ir.homedepot.com/ethics.cfm
66	Peugeot	Yes	GC	Anti-Corruption Policy, Employees Training	Giftmanagement, Disciplinary Action	Code of Ethics, Compliance Officer	Code of Ethics Corporate Citizenship	http://www.sustainability.psa-peugeot-citroen.com/upload/files/charte_ethique_en.pdf http://www.sustainability.psa-peugeot-citroen.com/corporate-citizenship/institutions-communities/indicators.htm?id=4284
67	LG	No						
68	Électricité de France	Yes	GC	Anti-Corruption Policy	Giftmanagement, Whistleblowing	Ethics Handbook, Head of Group Ethics	Ethics Handbook Ethics Alert	http://groupe.edf.com/fichiers/fckeditor/File/Group/EDF_EthicsHandbook.pdf http://group.edf.com/the-edf-group/presentation-of-the-group/commitments/code-of-ethics/ethics-alert-95148.html
69	Aviva	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Improper Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Business Ethics Code	Business Ethics Code Combating financial crimes	http://www.aviva.com/files/pdf/aviva_bus_ethics_code.pdf http://www.aviva.com/csr08/index.asp?pageid=126
70	Barclays	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering	Whistleblowing, Disciplinary Action	"Your Responsibilities"	Policy Positions	http://www.barclays.com/sustainabilityreport07/policy_positions.html
71	Fiat	Yes		Anti-Corruption and Bribery Policy, Money Laundering Prevention, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer, Compliance Program	Fiat Group Sustainability Report 2007 Fiat group Code of Conduct	http://www.fiatgroup.com/en-us/responsibility/rapp_sostenibilita/Documents/Fiat_Group_Sustainability_Report_2007.pdf http://www.fiatgroup.com/en-us/responsibility/objectives/Documents/Cod_Eng.pdf
72	Matsushita Electric Industrial	Yes		Anti-Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	The Panasonic Report for Sustainability 2008	http://panasonic.net/csr/reports/pdf/csr2008e.pdf
73	BASF	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Chief Compliance Officer	Code of Conduct Chief Compliance Officer Compliance	http://www.basf.com/group/corporate/en/content/about-basf/vision-values-principles/code-of-conduct/index http://www.basf.com/group/corporate/en/content/sustainability/values-compliance/chief-compliance-officer?mid=0 http://berichte.basf.de/basfir/html/2007/en/thecompany/values/compliance.html
74	Credit Suisse	Yes	GC	Anti-Corruption Policy, Prevention of money laundering and Financing Terrorism	Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Department	Code of Conduct Whistleblower Process	http://www.credit-suisse.com/governance/doc/code_of_conduct_en.pdf http://www.credit-suisse.com/governance/en/pop_whistleblower.html
75	Sony	Yes	GC	Anti-Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Sony Group Code of Conduct, Compliance Office	CSR Report 2008 Code of Conduct	http://www.sony.net/SonyInfo/Environment/issues/report/2008/pdf/CSR2008E_all.pdf https://www.sonymstyle-europe.com/SonyStyle/mimes/openAccess/promotion/TC/pdf/SGCC_en.pdf
76	Telefónica	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	2007 Corporate Social Responsibility Report	http://www.telefonica.es/cr2007/rc2007/site/docs/cronline2007.pdf
77	UniCredit Group	Yes	GC	Anti-Corruption and Bribery Policy	n/a	Chief Compliance Officer	2007 Sustainability Report	http://www.unicreditgroup.eu/en/responsabilita/bilancio_sociale/allegati/environmental_report_2007.pdf

78	BMW	Yes	GC	Anti-Corruption and Bribery Policy	Disciplinary Action	Compliance Committee	Sustainable Value Report 2007/2008	http://www.bmwgroup.com/bmwgroup_prod/e/0_0_www_bmwgroup_com/verantwortung/publikationen/sustainable_value_report_2007/_pdf/SVR2007BMW_e.pdf
79	Procter & Gamble	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Ethics Committee	2008 Sustainability Full Report Worldwide Business Conduct Manual Our Values and Principles	http://www.pg.com/innovatingsustainability/PG_2008_Sustainability_Report.pdf http://www.pg.com/company/our_commitment/corp_gov/WBCMRREDUCED_Single_Page.pdf http://www.pg.com/images/company/who_we_are/pdf/values_and_policies907.pdf
80	CVS Caremark	Yes		Anti-Bribery Policy, Prevention of Money Laundering and Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance Officer	2007 Corporate Social Responsibility Report Code of Conduct	http://www.cvscaremark.com/files/CVS_Caremark_CSR.pdf http://media.corporate-ir.net/media_files/IROL/99/99533/corpgov/CodeofConduct03.pdf
81	UnitedHealth Group	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Kickbacks and Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Principles of Ethics & Integrity	http://www.unitedhealthgroup.com/global/100-3168E&principles06.27.08.pdf
82	Hyundai Motor	Yes		Anti-Bribery Policy	Whistleblowing	Guidelines for Employees Behaviour, Ethics Committee	Hyundai Motor Company 2008 Sustainability Report Cyber Audit Office	http://csr.hyundai-motor.com/download/Sustainability(ENG)_2008.pdf http://audit.hyundai-motor.com/Eng/Common/html/cyber/protection.aspx
83	U.S. Postal Service	No						no information displayed on Homepage
84	France Télécom	Yes	GC	Anti-Corruption Policy	Giftmanagement	Code of Conduct, Ethics Compliance Committee	The France Telecom Group Code of Ethics	http://www.orange.com/en_EN/tools/boxes/documents/att00003804/0705470_ORANG_charte_gb.pdf
85	Vodafone	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	Corporate Responsibility Report Code of Ethics	http://www.vodafone.com/etc/medialib/attachments/cr_downloads.Par.31853.File.dat/200708%20Vodafone%20CR%20Report.pdf http://www.vodafone.com/start/about_vodafone/corporate_governance/code_of_ethics.html
86	SK Holdings	No						No information available on group level
87	Kroger	Yes		Anti-Bribery Policy, Prevention of Kickbacks and Unlawful Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	2008 Sustainability Report The Kroger Co. Policy on Business Ethics	http://www.thekrogerco.com/documents/KrogerSustainReport08.pdf http://www.thekrogerco.com/documents/EthicsPolicy.pdf
88	Nokia	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Code of Conduct	Nokia CR Report 2007 Nokia Code of Conduct	http://www.nokia.com/NOKIA_COM_1/Corporate_Responsibility/CR_Report_2007/Nokia_CR_Report_2007_Printable.pdf http://www.nokia.com/NOKIA_COM_1/Corporate_Responsibility/Ethics/Tools/Code_of_conduct/Nokia_Code_of_conduct.pdf
89	ThyssenKrupp	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing	Code of Conduct, Compliance Officer	Compliance Program Compliance Commitment Whistleblower Hotline	http://www.thyssenkrupp.com/en/konzern/compliance.html http://www.thyssenkrupp.com/en/konzern/commitment.html http://www.thyssenkrupp.com/en/konzern/whistleblower_start.html
90	Lukoil	No						no information displayed on Homepage
91	Toshiba	Yes	GC	Anti-Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Risk-Compliance Committee, Chief Risk-Compliance Management Officer	Corporate Social Responsibility Report 2008 Toshiba Group Standards of Conduct	http://www.toshiba.co.jp/csr/en/report/pdf/report08_all.pdf http://www.toshiba.co.jp/csr/en/soc/all.htm#SOC0404
92	Repsol YPF	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Payment Irregularities, Employees Training	Giftmanagement, Disciplinary Action	Code of Conduct, Ethics Committee	Ethics and Conduct Regulation for REPSOL YPF Employees	www.repsol.com/imagenes/es_en/26_04_2006_Norma_Etica%20Conducta%20Ingles_tcm11-127560.pdf
93	Boeing	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ethics and Business Conduct Committee, Ethics Advisor	Ethical Business Conduct Guidelines Education and Awareness Boeing Ethics Line	http://www.boeing.com/companyoffices/aboutus/ethics/ethics_booklet.pdf http://www.boeing.com/companyoffices/aboutus/ethics/education.htm http://www.boeing.com/companyoffices/aboutus/ethics/hotline.html
94	Prudential	Yes		Anti-Bribery Policy, Prevention of Money Laundering and Financing Terrorism, Employees Training	Whistleblowing, Disciplinary Action	Code of Conduct	Corporate Responsibility Report 2007/2008 Anti-Bribery Statement	http://www.investis.com/prudential-plc/cr/library/crreports/crreport07/crreport07.pdf http://www.prudential.co.uk/prudential-plc/cr/managementpolicies/antibribery/
95	Petronas	No						no information displayed on Homepage
96	AmerisourceBergen	Yes		Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics and Business Conduct, Chief Compliance Officer	Code of Ethics and Business Conduct	http://media.corporate-ir.net/media_files/IROL/61/61181/corpgov/code_of_ethics1.pdf
97	GdF Suez	Yes	GC	Anti-Corruption Policy, Employees Training	Whistleblowing, Disciplinary Action	Code of Conduct, Group Ethics Officer	07 Gaz de France Sustainable Development Report Code of Conduct	http://www.gdfsuez.com/fileadmin/user_upload/pdf/gdf_rdd07_gb_1211205586.pdf http://www.gdfsuez.com/fileadmin/user_upload/pdf/Code_of_Conduct_Handling_of_the_Info_GDF_SUEZ_GB110708.pdf
98	Munich Re Group	Yes	GC	Anti-Corruption and Bribery Policy, Money Laundering Prevention, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Conduct Munich Re Group Annual Report 2006	http://www.munichre.com/app_resources/pdf/ir/corporate_governance/code_of_conduct_en.pdf http://www.munichre.com/publications/302-05252_en.pdf
99	Costco Wholesale	Yes		Anti-Bribery and Corruption Policy, Prevention of Kickbacks	Giftmanagement, Disciplinary Action	Code of Ethics	Code of Ethics	http://media.corporate-ir.net/media_files/NSD/cost/reports/our_mission.pdf
100	Merrill Lynch	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	The Way We Do Business	http://www.ml.com/media/18358.pdf