

Rank	Company	Corporate Anti-Corruption Policies	Global Compact	Measures	Practices	Implementation Mechanisms	Source(s)	Link	Comments
201	Marubeni	Yes		Anti-Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Compliance Manual, Compliance Officer, Compliance Committee	CSR Report 2008 Compliance Manual	http://www.marubeni.com/dbps_data/_material/_maruco_en/data/csr/pdf/csr_08e.pdf http://www.marubeni.com/company/policy/compliance.html	
202	Legal & General Group	Yes		Anti-Corruption and Bribery Policy	Whistleblowing, Giftmanagement	Code of Ethics	Code of Ethics	http://files.shareholder.com/downloads/LGEN/548148452x0x260382/1d31e4ba-644e-4e8d-a97e-3816b5f60cfb/CW1075200812LoRes.pdf	
203	Rosneft Oil	No							No information displayed on Homepage
204	Banco Bradesco	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering and Financing Terrorism	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethical Conduct, Ethical Conduct Committee, Ombudsman	2007 Sustainability Report Code of Ethical Conduct	http://www.bradesco.com.br/uploads/conteudo/18749/RS_2007_eng.pdf http://www.bradesco.com.br/uploads/conteudo/1337/Codigo_de_Conduca_Etica_-_30_10_2008_-_eng_rev.pdf	
205	Foncière Euris	No							No information displayed on Homepage
206	Reliance Industries	Yes	GC	n/a	Whistleblowing	Code of Conduct	Sustainability Report 2006-07	http://ril.com/downloads/pdf/RIL-SR2006-07.pdf	
207	Walt Disney	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Standards of Business Conduct	Standards of Business Conduct Business Standards and Ethics Training	http://corporate.disney.go.com/corporate/conduct_standards.html http://corporate.disney.go.com/corporate/cr_business_standards.html	
208	J. Sainsbury	No							No information displayed on Homepage
209	Swiss Reinsurance	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Group Code of Conduct, Compliance Officer	2007 Corporate Responsibility Report Group Code of Conduct	http://www.swissre.com/resources/dfe971804a1e544b890edb1e1eec54e8-CR_Report_2007.pdf http://www.swissre.com/resources/ea04d400455c503b8a4bba80a45d76a0-Group_code_short_en.pdf	
210	Mitsubishi Electric	No							No information displayed on Homepage
211	National Australia Bank	Yes		Anti-Corruption and Bribery Policy, Prevention of Fraud and Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Conduct Group Whistleblower Policy	http://www.nabgroup.com/vgnmedia/download/CodeOfConductAustJan08.pdf http://www.nabgroup.com/vgnmedia/download/GroupWhistleblowerPolicyJan08.pdf	
212	Denso	Yes	GC	Anti-Bribery Policy, Employees Training	Whistleblowing	Code of Conduct	CSR Report 2008	http://www.globaldenso.com/en/csr/report/2008/pdf/e2008.pdf	
213	KBC Group	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing	Code of Conduct, Group Compliance Division	Corporate Social Responsibility Report 2007 Code of Conduct KBC Group's Anti-corruption policy statement	https://multimediafiles.kbcgroup.eu/ng/published/KBCCOM/PDF/COM_RVG_pdf_CSR_rapport_2007.pdf http://newkbc-pdf.kbc.be/financial_information/KBC_code_of_conduct_ENG.pdf http://newkbc-pdf.kbc.be/financial_information/KBC_anti_corruption.pdf	
214	FedEx	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct & Ethics	Global Citizenship Report 2008 Code of Business Conduct & Ethics	http://citizenshipblog.fedex.designcdt.com/fedex_citizenship_2008.pdf http://ir.fedex.com/downloads/code.pdf	
215	Nippon Mining Holdings	Yes	GC	n/a	Whistleblowing	n/a	CSR Report 2008	http://www.shinnikko-hd.co.jp/english/csr/report_2008/pdf/2008e_report_a4.pdf	
216	Ingram Micro	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing	Code of Conduct	Code of Conduct	http://media.corporate-ir.net/media_files/irol/98/98566/gov/CodeofConduct4_08.pdf	
217	Sysco	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics, Ethics Compliance Board	Code of Business Conduct and Ethics	http://files.shareholder.com/downloads/SYY/540584555x0x229948/9d41f158-ec7b-42f6-9617-53f54d9ff517/CodeofConduct.pdf	
218	Cisco Systems	Yes	GC	Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct, Ethics Office	Code of Business Conduct	http://files.shareholder.com/downloads/CSCO/540611136x0x154706/03c08e05-ed0e-4916-9365-8d90bd5d29a/07_Cisco_Code_of_Business_ConductFY07_External.pdf	
219	Johnson Controls	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Disciplinary Action	Ethics Policy	2007 Global Reporting Initiative (GRI) Report Ethics Policy	http://www.johnsoncontrols.com/publish/us/en/sustainability/sustainability_reporting/global_reporting_initiative0.html http://lrn-media.course.lrn.com/jci/english-ethics.pdf	
220	Honeywell International	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Integrity and Compliance Officer	Code of Business Conduct	http://www51.honeywell.com/honeywell/common/documents/1.4_CodeOfConduct.pdf	
221	Prudential Financial	Yes		Anti-Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer, Ethics Office	Code of Business Conduct and Ethics	http://media.corporate-ir.net/media_files/irol/12/129695/_MTRC%20IR%20VERSION%20052808.pdf	
222	Air France-KLM Group	Yes	GC	n/a	n/a	n/a			
223	Agricultural Bank of China	No							No information displayed on Homepage
224	POSCO	Yes	GC	Anti-Bribery Policy, Prevention of Illegal Monetary Transactions, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ombudsman	Sustainability Report 2007	http://www.posco.com/homepage/docs/eng/dn/sustain/report/2007_SR_en.zip	
225	Old Mutual	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Fraud and Money Laundering, Employees Training	Whistleblowing, Giftmanagement	Code of Conduct, Group Compliance Officer	Corporate Citizenship 2007	http://www.oldmutual.co.za/ccr/Downloads/OM_World_Class.pdf	
226	China Southern Power Grid	No							No information displayed on Homepage

227	Sabir	No							No information displayed on Homepage
228	Woolworths	Yes		Anti-Bribery Policy Prevention of Money Laundering and Financing Terrorism	Giftmanagement, Disciplinary Action	Code of Conduct	Code of Conduct	http://media.corporate-ir.net/media_files/irol/14/144044/cg/codeofconduct.pdf	
229	DZ Bank	Yes	GC	Anti-Bribery Policy, Prevention of Kickbacks and Money Laundering	Whistleblowing	Compliance Office, Ombudsman	Nachhaltigkeitsbericht 2008	http://www.dzbank.de/unternehmen/index.jsp?path=/downloads/DZBANK_Nachhaltigkeitsbericht_2008.pdf	Report in German language
230	Manulife Financial	Yes		Anti-Corruption and Bribery Policy, Prevention of Fraud and Blackmailing, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics, Compliance Officer	Code of Business Conduct and Ethics	http://www.manulife.com/corporate/corporate2.nsf/LookupFiles/BusinessEthicsBusinessConductandEthics2008-FullDocument/\$File/businessConductEthics.pdf	
231	Centrica	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Fraud and Blackmailing, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Corporate Responsibility Committee	Corporate Responsibility Report 2007 Group Public Interest Disclosure ('Speak Up') Policy Group gifts and hospitality policy	http://files.the-group.net/library/centrica/zips/_234.zip http://www.centrica.com/files/pdf/businessprinciples_speakup.pdf http://www.centrica.com/files/pdf/businessprinciples_gifts_hospitality.pdf	Website only available in Japanese language
232	Millea Holdings	No							
233	SNCF	Yes	GC	n/a	n/a	n/a			
234	American Express	Yes		Anti-Corruption and Bribery Policy, Prevention of Improper Payments and Money Laundering and Financing Terrorism, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer, Ombudsman	Code of Conduct Sustainability Report 2007	http://media.corporate-ir.net/media_files/irol/64/64467/2007_AXP_COC.pdf http://www.vale.com/vale_us/media/sustainability_report_-_complete_version.pdf	
235	CVRD	Yes	GC	Anti-Corruption Policy	Giftmanagement, Disciplinary Action	Code of Ethical Conduct	Code of Ethical Conduct	http://www.vale.com/vale/media/Codigo_de_Conduta_Etica.pdf	
236	Sumitomo	Yes		Anti-Bribery Policy, Prevention of Unlawful Payments, Employees Training	Whistleblowing	Compliance Committee	Sustainability Report 2008	http://www.sumitomocorp.co.jp/english/society/doc/env2008e.pdf	
237	Northrop Grumman	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Financing Terrorism, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Corporate Office of Ethics and Business Conduct, Code of Conduct	Corporate Social Responsibility Report 2007 Standards of Business Conduct	http://www.northropgrumman.com/corporate-responsibility/pdf/2007-corporate-social-responsibility-report.pdf http://www.northropgrumman.com/corporate-responsibility/ethics/noc_standards_conduct.pdf	
238	Danske Bank Group	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism	Giftmanagement	Code of Conduct	Code of Conduct Danske Bank's global policy to prevent money laundering and financing of terrorism	http://www.danskebank.com/en-uk/CSR/policies/Pages/Code_of_conduct.aspx http://www.danskebank.com/en-uk/ProdServ/Institutional/financial-institutions/Documents/db_aml_policy.pdf	
239	La Poste	Yes	GC	n/a	n/a	n/a			
240	Hess	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	2007 CORPORATE SUSTAINABILITY REPORT CODE OF BUSINESS CONDUCT AND ETHICS	http://www.hess.com/downloads/reports/EHS/US/2007/2007.pdf http://media.corporate-ir.net/media_files/irol/10/101801/corgov/2007_CODEOFCONDUCT.pdf	
241	Wolseley	Yes		Anti-Corruption and Bribery Policy, Fraud Prevention, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics	Corporate Responsibility Report 2008 Code of Ethics	http://www.wolseley.com/CorporateResponsibility/Documents/Wolseley_Corporate_Responsibility_2008.pdf http://www.wolseley.com/InvestorRelations/Ourgovernanceandethics/CodeofEthics/default.asp	Website only available in Japanese language
242	Meiji Yasuda Life Insurance	No							
243	KDDI	Yes		Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Ethics, Business Ethics Committee	Annual Report 2008	http://www.kddi.com/english/corporate/ir/library/annual_report/pdf/kddi_ar2008_e.pdf	
244	GMAC	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Financing Terrorism and Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct and Ethics, Chief Compliance Officer	Code of Conduct and Ethics Sustainability Report 2007	http://media.corporate-ir.net/media_files/irol/13/139684/corgov/codeofethics.pdf http://cyber.kepco.co.kr/kepco_new/eng/common/pdf_view.jsp?sn=2500&gubun=6&folder=sustain&file_in=2007report_eng(2).pdf&file_out=2007report_eng(2).pdf	
245	Korea Electric Power	Yes	GC	Anti-Corruption Policy, Employees Training	Whistleblowing	Code of Conduct, Ombudsman	Sustainability Report Balance 2008	http://konzern.lufthansa.com/en/downloads/presse/downloads/publikationen/ih_sustainability_2008.pdf	
246	JFE Holdings	No							No information displayed on Homepage
247	Samsung Life Insurance	No							No information displayed on Homepage
248	Comcast	Yes		Anti-Corruption Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics and Business Conduct	Code of Ethics and Business Conduct	http://www.cmcsk.com/phoenix.zhtml?c=118591&p=irol-govConduct	
249	Alcoa	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Guide to Business Conduct Corruption Statement	http://www.alcoa.com/global/en/about_alcoa/corp_gov/pdfs/English_US_Guide06.pdf http://www.alcoa.com/global/en/about_alcoa/corp_gov/sustainability_metrics.asp#	
250	Lufthansa Group	Yes	GC	Anti-Corruption Policy	n/a	n/a	Sustainability Report Balance 2008	http://konzern.lufthansa.com/en/downloads/presse/downloads/publikationen/ih_sustainability_2008.pdf	
251	Suzuki Motor	No							No information displayed on Homepage
252	DuPont	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Corporate Compliance Officer	GRI Report Code of Conduct	http://www2.dupont.com/Sustainability/en_US/assets/downloads/gri.pdf http://media.corporate-ir.net/media_files/irol/73/73320/corgov/code_of_conduct.pdf	
253	Scottish & Southern Energy	No							No information displayed on Homepage
254	George Weston	No							No information displayed on Homepage

255	Mazda Motor	No								No information displayed on Homepage
256	ABB	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Improper Payments and Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Office	The ABB Group Annual Report 2007 Sustainability review Code of Conduct	Compliance Program Compliance Training	http://search.abb.com/library/Download.aspx?DocumentID=ARSR07EN&LanguageCode=en&DocumentPartID=&Action=Launch&IncludeExternalPublicLimited=True http://search.abb.com/library/ABBLibrary.asp?DocumentID=7ABA101167&LanguageCode=en&DocumentPartID=&Action=Launch http://www.abb.com/cawp/abbzh252/6b688d1047a76576c1257405004bd871.aspx http://www.abb.com/cawp/abbzh252/87d9dfe10b612385c1257405004ebeb.aspx	
257	Sinochem	No								No information displayed on Homepage
258	Endesa	Yes	GC	n/a	Whistleblowing	Code of Conduct, Compliance Committee	Sustainability Report 2007		http://www.endesa.es/Portal/es/inf_acc_inv/Informes_Anuales/Informe_de_Sostenibilidad/informe_2007_ing.htm	
259	Baosteel Group	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Disciplinary Action	n/a	Sustainability Report 2006		http://tv.baosteel.com/ir/other/s2006e.pdf	
260	TUI	No								No information displayed on Homepage
261	Sharp	Yes		Anti-Corruption and Bribery Policy, Prevention of Illegal Payoffs and Improper Expenditures, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Environmental and Social Report 2008 Code of Conduct		http://sharp-world.com/corporate/eco/csr_report/2008pdf/sharp_eall.pdf http://sharp-world.com/corporate/info/charter/cc/index.html	
262	Idemitsu Kosan	Yes		Anti-Corruption Policy, Employees Training	Giftmanagement, Whistleblowing	Compliance Handbook	Idemitsu Group CSR Report 2008		http://www.idemitsu.co.jp/e/environment/pdf/2008/all_e.pdf	
263	Rio Tinto Group	Yes	GC, GRI	Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Facility Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Group Compliance Officer	The Way We Work Business Integrity Guidance		http://www.riotinto.com/documents/ReportsPublications/the_way_we_work.pdf http://www.riotinto.com/documents/CorpPub_Business_integrity_guidance.pdf	
264	Vivendi	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Prohibited Payments and Expenses	Giftmanagement, Disciplinary Action	Code of Conduct, Compliance Officer	Compliance Program		http://www.vivendi.com/vivendi/IMG/pdf/20061012_compliance_program-2b-en.pdf	
265	AstraZeneca	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Code of Conduct		http://www.astrazeneca.com/_mshost3690701/content/resources/media/az_coc_english.pdf	
266	Anglo American	Yes	GC	Anti-Corruption and Bribery Policy	Whistleblowing, Disciplinary Action	Code of Ethics	Report to Society 2007		http://www.investis.com/aa/docs/gr_2008_04_15.pdf	
267	GS Holdings	No								No information displayed on Homepage
268	New York Life Insurance	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Ombudsman, Compliance Department, Office of Business Conduct	Integrity Manual		http://www.newyorklife.com/cda/0,3254,15639,00.html	
269	Sumitomo Life Insurance	No								No information displayed on Homepage
270	ACS	Yes	GC	Anti-Bribery Policy	Giftmanagement, Disciplinary Action	Code of Conduct	Code of Conduct		http://www.grupoacs.com/ficheros_editor/File/05_responsabilidad_corporativa/08%20Etica%20y%20Profesionalidad%20/codigo_de_conducta_del_grupo_acs_15_03_2007_en.pdf	
271	Power Corp. of Canada	No								No information displayed on Homepage
272	Xstrata	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Disciplinary Action	Business Principles	Sustainability Report 2007		http://www.xstrata.com/assets/pdf/x_sustainability_2007.pdf	
273	Itaúsa-Investimentos Itaú	No								No information displayed on Homepage
274	Adecco	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance & Ethics Office	Sustainability Report 2004-2007 Code of Business Conduct		http://www.adecco.com/AboutAdecco/Documents/Publications/1.10_adecco_sr_2004_2007_ang.pdf http://www.adecco.com/AboutAdecco/CodeOfConduct/Documents/Code_of_conduct.pdf	
275	Coca-Cola	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Ethics Officer, Ethics and Compliance Office	2007/2008 Sustainability Review Code of Business Conduct		http://www.thecoca-colacompany.com/citizenship/pdf/2007-2008_sustainability_review.pdf http://www.thecoca-colacompany.com/ourcompany/pdf/COBC_English.pdf	
276	Bridgestone	No								No information displayed on Homepage
277	CRH	Yes		Anti-Corruption and Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Conduct	CSR Report 2007 Code of Business Conduct		http://www.investis.com/crhcorp/csrpres/CSR2007.pdf http://www.crh.com/crhcorp/about/employeescode/english_code.pdf	
278	Shinhan Financial Group	No								No information displayed on Homepage
279	Woori Finance Holdings	No								No information displayed on Homepage
280	News Corp.	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Prohibited Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance and Ethics Officer	Standards of Business Conduct		http://www.newscorp.com/corp_gov/StdBusinessConduct.pdf	
281	BAE Systems	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Corporate Responsibility Report 2007 Code of Conduct		http://www.baesystems.com/BAEProd/groups/public/documents/bae_publication/bae_pdf_cr_rreport2007vii.pdf http://www.baesystems.com/BAEProd/groups/public/documents/bae_publication/bae_pdf_759of003_001.pdf	
282	Banco do Brasil	No								No information displayed on Homepage

283	América Móvil	No							No information displayed on Homepage
284	PPR	No							No information displayed on Homepage
285	Mitsubishi Heavy Industries	Yes	GC	Anti-Bribery Policy, Employees Training	n/a	MHI Compliance Guidelines, Compliance Committee	CSR Report 2008	http://www.mhi.co.jp/en/csr/csrreport/contents/library/pdf/csrreport_2008.pdf	
286	Hutchison Whampoa	No							No information displayed on Homepage
287	Bharat Petroleum	No							No information displayed on Homepage
288	China Telecommunications	No							No information displayed on Homepage
289	L.M. Ericsson	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Code of Business Ethics	Ericsson Corporate Responsibility Report 2007 CODE OF BUSINESS ETHICS	http://www.ericsson.com/ericsson/corporate_responsibility/doc/cr07/Ericsson_CRR_2007.pdf http://www.ericsson.com/ericsson/corporate_responsibility/doc/code_business_ethics.pdf	
290	Hindustan Petroleum	Yes	GC	Anti-Corruption and Bribery Policy	Disciplinary Action	Conduct, Discipline and Appeal Rules	Commitment to Global Compact : Communication on Progress at Hindustan Petroleum Corporation Ltd.	http://www.unglobalcompact.org/data/ungc_cops_resources/7EB4BE44-6751-426E-85D9-B7B7C17973F1/COP.doc	
291	Aetna	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Illegal Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Chief Compliance Officer	Code of Conduct	http://www.aetna.com/governance/assets/code.pdf	
292	Flextronics International	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Corporate Code of Business Conduct and Ethics, Electronic Industry Code of Conduct, Chief Compliance Officer	Corporate Code of Business Conduct and Ethics Electronic Industry Code of Conduct	http://www.flextronics.com/en/portals/0/Code%20of%20Business%20Conduct%20and%20Ethics.pdf http://www.flextronics.com/en/portals/0/industry%20code%20of%20conduct.pdf	
293	Coles Group	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics and Conduct	Code of Ethics and Conduct	http://www.wesfarmers.com.au/getfile.aspx?Type=document&ID=33772&ObjectType=3&ObjectID=3139	
294	TIAA-CREF	No							No information displayed on Homepage
295	OMV Group	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Disciplinary Action	Code of Conduct, Corporate Compliance Officer	Corporate Social Responsibility Performance Report 2005/06 Code of Conduct - Our Values Compliance Management	http://www.omv.com/SecurityServlet/secure?cid=1193118904015&lang=en&swa_id=1134782031287.5163&swa_site=wps.vp.com http://www.omv.com/SecurityServlet/secure?cid=1184681579151&lang=en&swa_id=1134782031287.5163&swa_site=wps.vp.com http://www.omv.com/portal/01/com/kcxml/04_Sj9SPykssy0xPLMnMz0vM0Y_Qj4o3i_c1sPRw8ww1CnU08TRwCjKN93Y1AikFShn4m1oEejk6G7kauHt6-HrEG5vqR-LXEmDp5B1q6Bj4mQs6hmqYZv6GyAW4-vR35uqn5Qap6-t36AfkFuaES5o6MIAKDI1EE!delta/base64xml/L3dJdyEvd0ZNQUFzQUmVNEIVRS9fN9NMDIIRkIVMVBNEkwQII1X0tFMg!	
296	General Dynamics	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Standards of Business Ethics & Conduct	Standards of Business Ethics & Conduct, Corporate Ethics Officer	http://media.corporate-ir.net/media_files/irol/85/85778/cg/bluebook.pdf	
297	Bayerische Landesbank	Yes		Anti-Corruption Policy, Prevention of Money Laundering and Financing Terrorism and Economic Crimes, Employees Training	n/a	Code of Conduct	Sustainability Report	http://www.bayernlb.de/ar/Internet/en/Downloads/0100_CorporateCenter/1122Konzernentwicklung/Sustainability_report_2007.pdf	
298	Tyson Foods	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickoffs, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	(International) Code of Conduct, Compliance Department	2007 Sustainability Report International Code of Conduct	http://www.tyson.com/Corporate/PressRoom/docs/SR2007.pdf http://media.corporate-ir.net/media_files/irol/65/65476/govDocs/TSN_International_Code_of_Conduct_English.pdf	
299	HCA	Yes		Anti-Corruption Policy, Prevention of Kickbacks, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Corporate Ethics and Compliance Department	Code of Conduct Ethics Line	http://ec.hcahealthcare.com/CPM/HCA_Code_English_printable%20FINAL%20(2).pdf http://ec.hcahealthcare.com/CustomPage.asp?PageName=EthicsLine	
300	Cathay Financial Holdings	No							No information displayed on Homepage