

Rank	Company	Corporate Anti-Corruption Policies	Global Compact	Measures	Practices	Implementation Mechanisms	Source(s)	Link	Comments
401	Compass Group	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering	Whistleblowing, Giftmanagement,	Code of Ethics	Corporate Responsibility Report 2008 Code of Ethics Corporate Governance	http://cr08.compass-group.com/getdoc/ed3bfb4-7ec1-4ed8-8238-a45ee35a1897/Resource.aspx http://cr08.compass-group.com/getdoc/a7e37a52-3587-40e8-8a40-a40f6568415e/compass-code-of-ethics-jun2006.aspx http://annualreport08.compass-group.com/governance/corporate-gov.html	
402	Westpac Banking	Yes	GC	Prevention of Money Laundering and Financing Terrorism and Economic Crimes	Giftmanagement, Whistleblowing, Disciplinary Action	Principles for Doing Business, Code of Conduct	Our principles for doing business Our Code of Conduct	http://www.westpac.com.au/manage/pdf.nsf/5A17C9B74D3266B3CA257059000E7A8C/\$File/Our_Principles_for_doing_business.pdf?OpenElement https://www.westpacfunds.com.au/pdf/Westpac%20Code%20of%20Conduct.pdf	
403	Coca-Cola Enterprises	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct, Ombudsman, Corporate Governance	2007 Corporate Responsibility and Sustainability Report Code of Business Conduct Corporate Governance - Ethics and Compliance Corporate Governance - Ombudsman Ethics and Compliance Hotline	http://www.cokecce.com/assets/uploaded_files/2007_CRCSRReport.pdf http://files.shareholder.com/downloads/CCE/475985480x0x58543/099edddf-50e5-45b0-9215-5bb766af9ae5/CCE_COBC.pdf http://ir.cokecce.com/ethics.cfm http://ir.cokecce.com/ombudsman.cfm http://files.shareholder.com/downloads/CCE/475985480x0x59081/5f25b186-707d-42f1-8085-6cd5e0bd44f7/CG_EthicsHotline.pdf	
404	SHV Holdings	No							No information displayed on Homepage
405	China Ocean Shipping	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Disciplinary Action	n/a	Cosco Sustainable Development Report 2007	http://www.cosco.com/GC_report/GC_report2008/web-en/c6-2-2.html	
406	Sberbank	No							No information displayed on Homepage
407	Stora Enso	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Kickbacks, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Principles for Social Responsibility	sustainability performance 2008 Sustainability News 2007 Stora Enso Principles for Social Responsibility Stora Enso Code of Ethics Statement Annual Report 2007	http://www.storaenso.com/media-centre/publications/sustainability-report/Documents/Sustainability%20Performance%202008.pdf http://www.storaenso.com/sustainability/publications/sustainability-news/Documents/sustainability-news-32007.pdf http://www.storaenso.com/sustainability/policies/principles-for-social-responsibility/Documents/sr-principles-english.pdf http://www.storaenso.com/sustainability/policies/Documents/code-of-ethics-statement-december-2006.pdf http://www.storaenso.com/Documents/annual-report-2007-eng.pdf	
408	CFE	No							No information displayed on Homepage
409	China National Offshore Oil	No							No information displayed on Homepage
410	Goodyear Tire & Rubber	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper/Illegal Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Business Conduct Manual	Corporate Responsibility Report 2007 Business Conduct Manual	http://www.goodyear.com/corporate/about/responsibility/gy_corresp_en07.pdf http://www.goodyear.com/investor/pdf/business_conduct_manual.pdf	
411	Skanska	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Undue Payments, Employees Training	n/a	Code of Conduct	Sustainable development 2008 Code of Conduct Training and Education	http://www.skanska.com/upload/About%20Skanska/Sustainability/Reporting/Sustainability_2008.pdf http://www.skanska.com/upload/About%20Skanska/Sustainability/Responsibility/47CodeConduct_301008.pdf http://www.skanska.com/en/About-Skanska/Sustainability/Social-responsibility/Training-education/	
412	China Minmetals	No							No information displayed on Homepage
413	Manpower	Yes	GC	Anti-Corruption Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Conduct and Ethics	Code of Business Conduct and Ethics Manpower Ethics Hotline	http://files.shareholder.com/downloads/MAN/521703443x0x259442/c13a45e9-56e7-4b4e-9491-9e4fe50fa44f/MANPCSRsinglepLR.pdf http://www.manpower.com/about/documentdisplay.cfm?DocumentID=1483 http://www.manpower.com/about/documentdisplay.cfm?DocumentID=1489	
414	Nationwide Building Society	No							No information displayed on Homepage
415	T&D Holdings	Yes		Employees Training	Whistleblowing, Giftmanagement	Group Compliance Code of Conduct	CSR Report 2008	http://www.td-holdings.co.jp/e/csr/csr_report/pdf/e_CSRreport2008.pdf	
416	Plains All American Pipeline	Yes		Anti-Bribery Policy, Prevention of Payoffs	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Conduct	http://www.paalp.com/_filelib/FileCabinet/Legal/Code_of_Conduct-2008.pdf?FileName=Code_of_Conduct-2008.pdf	
417	U.S. Bancorp	Yes		Prevention of Money Laundering and Illegal Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics and Business Conduct, Chief Ethics Officer	Code of Ethics and Business Conduct	http://www.usbank.com/cgi_w/cfm/about/ethics/pdf/Ethics_Handbook.pdf	
418	Energie Baden-Württemberg	No							No information displayed on Homepage
419	Standard Life	No							No information displayed on Homepage
420	Occidental Petroleum	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct, Chief Compliance Officer	Code of Business Conduct	http://www.oxy.com/SiteCollectionDocuments/code_of_business_conduct.pdf	
421	Crédit Industriel & Commercial	Yes		Prevention of Money Laundering and Financing Terrorism	n/a	n/a	2007 Rapport annuel	https://www.cic.fr/fr/banques/telechargements/CIC_rapport-annuel_2007.pdf	Report in French language
422	UAL	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ethics and Compliance Office	Code of Conduct	http://ir.united.com/phoenix.zhtml?c=83680&p=irol-govConduct	
423	Groupe Danone	Yes	GC	Anti-Corruption Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Principles of Business Conduct	Sustainability Report 2007 Business Conduct Policies	http://www.danone.com/images/pdf/dan_ratechdevdurable07_en.pdf http://media.corporate-ir.net/media_files/irol/95/95168/cg/Business_Conduct_Policies_(version_anglaise_V3.2_avr_06).pdf	

424	Grupo Ferrovial	Yes	GC	Anti-Corruption and Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Ethics	Code of Business Ethics Procedures against bribery and corruption Our Progress	http://www.ferrovial.es/recursos/doc/responsabilidad_social_corporativa/25521_3838200711145.pdf http://www.ferrovial.es/en/index.asp?MP=23&MS=0&MN=1&TR=C&IDR=1987&r=1024*768 http://www.ferrovial.es/en/index.asp?MP=23&MS=0&MN=1&TR=C&IDR=1972	
425	British American Tobacco	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism	Giftmanagement, Whistleblowing, Disciplinary Action	Standard of Business Conduct	Sustainability Report 2007 Standard of Business Conduct	http://www.bat.com/group/sites/uk___3mnfen.nsf/vwPagesWebLive/DO6RZGHL/\$FILE/medMD7FCGX8.pdf?openelement http://www.bat.com/group/sites/uk___3mnfen.nsf/vwPagesWebLive/DO725ECW/\$FILE/medMD7AMF48.pdf?openelement	
426	China Communications Construction	No							No information displayed on Homepage
427	Bristol-Myers Squibb	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Secret Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance and Ethics Officer, Ombudsman	Code of Conduct	http://www.bms.com/aboutbms/corporate_governance/content/data/SBCE_2008.pdf	
428	Finmeccanica	Yes		Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	Code of Ethics	http://www.finmeccanica.it/EN/Common/files/Holding/Corporate/Investor_relations/Corporate_Governance/Codice_etico_2008_UK.pdf	
429	J.C. Penney	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Statement of Business Ethics, Compliance Coordinator	Statement of Business Ethics	http://media.corporate-ir.net/media_files/IROL/70/70528/corpgov/JCEthicsrevised.pdf	
430	Petro-Canada	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Chief Compliance Officer	Report to the Community 2007-2008 Code of Business Conduct	http://www.petro-canada.ca/pdfs/PC_Community_2007_ENG.pdf http://www.petro-canada.ca/pdfs/Code_of_Business_Conduct_E.pdf	
431	Inbev	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing	Code of Business Conduct	Citizenship 08 People and Community	http://www.inbev.com/pdf/InBev_corpo_citizenship08.pdf http://www.inbev.com/pdf/InBev_People_and_Community.pdf	
432	Mediceo Pattac Holdings	No							No information displayed on Homepage
433	Sun Life Financial	Yes		Anti-Bribery Policy, Prevention of Money Laundering and Financing Terrorism and Payoffs and Kickbacks, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Conduct	Code of Business Conduct	http://www.sunlife.com/static/global/files/Code%20of%20business%20conduct/pa_e_code_of_business_conduct.pdf	
434	Komatsu	Yes		n/a	Giftmanagement, Whistleblowing	Code of Business Conduct, Compliance Committee, Compliance Officer	Code of Business Conduct	http://www.komatsu.com/CompanyInfo/profile/conduct/	
435	Japan Airlines	Yes	GC	Anti-Bribery Policy, Employees Training	Whistleblowing, Giftmanagement	Code of Conduct	CSR Report 2007 Code of Conduct	http://www.jal.com/en/corporate/csr2007/pdf/all.pdf http://www.jal.com/en/corporate/action.html	
436	Whirlpool	Yes		Prevention of Money Laundering	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics	Code of Ethics	http://www.whirlpoolcorp.com/shared/content/documents/NAR_English_Final.pdf	
437	Jardine Matheson	No							No information displayed on Homepage
438	Ricoh	Yes	GC	Anti-Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Group Code of Conduct	SUSTAINABILITY REPORT 2008 (CORPORATE SOCIAL RESPONSIBILITY) Group Code of Conduct	http://www.ricoh.com/about/csr/report/pdf2008/all.pdf http://www.ricoh.com/about/pdf/code.pdf	
439	Staples	Yes		Anti-Corruption and Bribery Policy, Prevention of Improper Payments and Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	2007 Staples Soul Report Code of Ethics	http://www.staples.com/sbd/img/content/soul/pdf/2007_staples_soul_report.pdf http://www.staples.com/sbd/img/content/soul/pdf/staples_code_of_ethics.pdf	
440	Fomento de Construcciones	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Irregular Payments	Whistleblowing	Code of Ethics	Corporate social responsibility report Group Code of Ethics	http://www.fcc.es/fcc/corp/informe/rsc_informe.rsc.2007_1.pdf http://www.fcc.es/fcc/corp/informe/rsc_codigo_etico_1.pdf	
441	Delta Air Lines	Yes		Anti-Corruption and Bribery Policy, Prevention of Unauthorized Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics and Business Conduct for Employees	Code of Ethics and Business Conduct for Employees	http://images.delta.com.edgesuite.net/delta/pdfs/CodeofEthics_021004.pdf	
442	Swiss Life	Yes		Anti-Bribery Policy, Prevention of Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Compliance, Compliance Officer	Code of Compliance	http://www.swisslife.com/etc/siml/slcom/obedl/1/600/621.File.dat/code_of_compliance_e.pdf	
443	Capital One Financial	No							No information displayed on Homepage
444	Exelon	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Conduct, Ethics and Compliance Office	Corporate Responsibility - Ethics Code of Business Conduct Code of Business Conduct Reporting Process	http://www.exeloncorp.com/corpresponsibility/ethics/ http://media.corporate-ir.net/media_files/irol/12/124298/corpgov/exc_codebusconduct_061013.pdf https://www.compliance-helpline.com/welcomeExelon.jsp	
445	Migros	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering	Giftmanagement, Whistleblowing	Code of Conduct, Department Legal Services & Compliance	Annual Report 2007 Landes-Gesamtarbeitsvertrag für die Migros-Gruppe	http://www.migros.ch/DE/Ueber_die_Migros/Das_Unternehmen/Zahlen_fakten/Geschaeftsberichte/Bestellung/Documents/MGB07_WEB_Geschaeftsb_kombi_e.pdf http://www.migros.ch/DE/Stellen/Die_Arbeitgeberin_Migros/Daten_Fakten_Wissen/Documents/LGAV_07_10_deutsch.pdf	Report partly in German language
446	Royal Mail Holdings	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering	n/a	Code of Business Standards	Social Responsibility Summary Report 2006-2007 Report and Accounts Year ended 30 March 2008	ftp://ftp.royalmail.com/Downloads/public/ctf/rmg/csr_report.pdf ftp://ftp.royalmail.com/Downloads/public/ctf/rmg/2007-08Group_Accounts_19-05-08Final.pdf	
447	Erste Bank	No							No information displayed on Homepage
448	Telstra	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Payoffs	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Code of Conduct The way we work – Telstra Business Principles Whistleblowers' policy and services	http://www.telstra.com.au/abouttelstra/investor/docs/pers_responsibility.pdf http://www.telstra.com.au/abouttelstra/corp/docs/Telstra-Business-Principles.pdf http://www.telstra.com.au/abouttelstra/corp/governance/values.cfm	
449	Kingfisher	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Disciplinary Action	Code of Conduct	Corporate Responsibility Summery Report 2007/08 Code of Conduct	http://www.kingfisher.co.uk/managed_content/files/reports/cr_report_2008/files/cr_report_08.pdf http://www.kingfisher.com/managed_content/files/sr_pdf/codeofconduct_business_2007.pdf	
450	Mitsui Sumitomo Insurance	Yes	GC						No further information displayed on Homepage

451	Kobe Steel	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Compliance Committee	Kobe Steel, Ltd. Corporate Code of Ethics	http://www.kobelco.co.jp/ICSFiles/afidfile/2008/05/23/1_cce_en2.pdf	
452	TJX	Yes		Anti-Bribery Policy, Prevention of Kickbacks and Improper Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Code of Conduct Guide	http://www.tjx.com/files/pdf/COC_June_2007_Distribution.pdf	
453	Eli Lilly	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct	Code of Business Conduct	http://www.lilly.com/pdf/red_book_eng_08.pdf	
454	Bank of Montreal	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism and Improper Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ombudsman	2008 Corporate Responsibility Report and Public Accountability Statement Corporate Responsibility – Our Approach Code of Conduct	http://www2.bmo.com/bmo/files/images/7/1/BMO_CRPAS2008en.pdf http://www2.bmo.com/content/0,1089,divld-7_langld-1_navCode-4853,00.html http://www2.bmo.com/content/0,1089,divld-3_langld-1_navCode-4263,00.html	
455	Akzo Nobel	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Sustainability Report 2007 Business Principles Code of Conduct Procedure for complaints on practices violating Business Principles, HRM, HSE- and Security Policy Statements and Corporate Directives	http://www.akzonobel.com/system/images/AkzoNobel_Sustainability_Report_2007_tcm9-1264.pdf http://www.akzonobel.com/aboutus/company_overview/business_principles/ http://www.akzonobel.com/system/images/AkzoNobel_Code_of_Conduct_tcm9-3675.pdf http://www.akzonobel.com/system/images/AkzoNobel_General_Complaints_Procedure_March_2008_tcm9-4688.pdf	
456	Murphy Oil	Yes		Anti-Corruption and Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Conduct and Ethics, Compliance Officer	Code of Business Conduct and Ethics	http://www.murphyoilcorp.com/about/media/pdf/Code%20of%20Business%20Conduct.pdf	
457	Express Scripts	Yes		Anti-Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance Officer	Code of Conduct	http://www.express-scripts.com/aboutus/codeconduct/ExpressScriptsCodeOfConduct.pdf	
458	Kimberly-Clark	Yes		Prevention of Illegal Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	2007 Sustainability Report Code of Conduct	http://www.kimberly-clark.com/pdfs/2007SustainabilityReport.pdf http://www.kimberly-clark.com/pdfs/Code%20of%20Conduct.pdf	
459	Sanyo Electric	Yes		n/a	Giftmanagement, Whistleblowing	Code of Conduct and Ethics, Compliance Officer	Code of Conduct Compliance	http://sanyo.com/environment/jp/pdf/pdf_data/kan2008_e.pdf http://www.sanyo.com/corporate/profile/code.html http://www.sanyo.com/corporate/profile/governance.html	
460	Marks & Spencer	Yes		Anti-Bribery Policy, Prevention of Kickbacks and Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	Code of Ethics	http://corporate.marksandspencer.com/documents/specific/investors/governance/code_of_ethics.pdf	
461	Kookmin Bank	No							Due to special technical requirements, Homepage in English language not accessible
462	Oracle	Yes		Anti-Corruption and Bribery Policy, Prevention of Illegal Payments and Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Business Conduct Officers	CORPORATE CITIZENSHIP REPORT 2008 Oracle Code of Conduct	http://www.oracle.com/corporate/community/corporate-citizenship-report-2008.pdf http://www.oracle.com/corporate/community/governance/cebc.pdf	
463	Mapfre Group	No							No information displayed on Homepage
464	Carso Global Telecom	No							No information displayed on Homepage
465	AutoNation	Yes		Anti-Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Business Ethics Program	Business Ethics Program	http://media.corporate-ir.net/media_files/irol/85/85803/CodeofEthicsProgram.pdf	
466	Loews	Yes		Anti-Bribery Policy, Prevention of Improper Payments and Payoffs	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics	Code of Business Conduct and Ethics	http://www.loews.com/loews.nsf/ethics.htm	
467	Premafin Finanziaria	No							Website only available in Italian Language
468	Henkel	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Improper Dealings, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance Officer	Sustainability Report 2008 Code of Conduct Conflicts of Interests, Gifts and Entertainment, Bribery and Improper Dealings	http://www.henkel.com/com/content_data/106983_2009.02.25_sustainabilityreport_en.pdf http://www.henkel.com/com/content_data/Code_of_Conduct.pdf http://www.henkel.com/com/content_data/103735_Code_of_Conduct_Appendix_en.pdf	
469	Freeport-McMoRan Copper & Gold	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism and Kickbacks and Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Principles of Business Conduct, Compliance Officer	2007 Working Toward Sustainable Development Report Principles of Business Conduct	http://www.fcx.com/envir/wtsd/pdf/wtsd/2007/wtsd2007.pdf http://www.fcx.com/ir/corp%20gov/Principles_Business_Conduct-english.pdf	
470	Cie Nationale à Portefeuille	No							No information displayed on Homepage
471	Skandinaviska Enskilda Banken	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism and Improper Payments, Employees Training	Giftmanagement, Whistleblowing	Code of Business Conduct, Compliance Officer	Corporate Responsibility Report Code of Business Conduct	http://www.sebgroup.com/pow/content/sebgroup/CorporateResponsibilityReport_eng.pdf http://www.sebgroup.com/pow/content/sebgroup/Code_of_Conduct.pdf	
472	Norsk Hydro	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Annual Report - 2008 Code of Conduct Whistleblowing	http://www.hydro.com/upload/Annual_reporting/annual_2008/downloadcenter/Reports/01_annual%20report.pdf http://www.hydro.com/upload/7233/code_conductv2_en.pdf http://www.hydro.com/en/About-Hydro/Corporate-governance/Governance-principles/Speak-out-dont-look-the-other-way/	
473	Sodexo	Yes	GC	Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Statement of Business Integrity	Sustainability Report 2008 Statement of Business Integrity Code of Conduct for Senior Managers	http://www.sodexo.com/group_en/Images/Sodexo_FY2008_Sustainability_Report_tcm13-250027.pdf http://www.sodexo.com/group_en/Images/policy_business_integrity_en_tcm13-55765.pdf http://www.sodexo.com/group_en/Images/code_of_conduct_tcm13-193189.pdf	
474	Cigna	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Chief Compliance Officer	Code of Ethics	http://www.cigna.com/about_us/governance/cigna_code_ethics.pdf	

475 Samsung C&T	No						No information displayed on Homepage
476 Aluminum Corp. of China	No						No information displayed on Homepage
477 PKN Orlen Group	Yes	GC	Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Ethics Compliance Officer	Report on Corporate Social Responsibility 2005-2006 Code of Ethics	http://www.orken.pl/Internet/doc/20070402/ROS_GB.pdf http://www.orken.pl/Internet/doc/20051111/Code_of_Ethics.pdf
478 British Airways	Yes		Anti-Corruption and Bribery Policy, Prevention of Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics Handbook for Corporate and Employee Conduct, Corporate Code of Conduct Committee	No. 6 - Staff Concerns Policy No.17 - Business Integrity - Bribery, Extortion & Corruption	http://www.britishairways.com/cms/global/pdfs/corporate_responsibility_report_2006/Basi06V1.pdf http://www.britishairways.com/cms/global/pdfs/corporate_responsibility_report_2006/Basi17V1.pdf
479 Toyota Industries	Yes		Employees Training	Whistleblowing		Toyota Industries Report 2008	http://www.toyota-industries.com/ir/library/annual/2008/tir/full.pdf
480 China Metallurgical Group	No						No information displayed on Homepage
481 Bombardier	Yes	GC	Anti-Corruption Policy, Prevention of Illegal and Improper Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics and Business Conduct, Compliance Officer	Corporate Responsibility Report 2008 Code of Ethics and Business Conduct	http://www.bombardier.com/files/en/supporting_docs/BOMBARDIER_Corporate_Responsibility2008_Secured_en.pdf http://www.bombardier.com/files/en/supporting_docs/CODE_EN_2005.pdf
482 Bank of Ireland Group	Yes		n/a	Whistleblowing, Giftmanagement, Disciplinary Action	Group Code of Conduct	Group Code of Conduct	http://www.bankofireland.com/includes/about_us_new/pdfs/group_code_of_conduct.pdf
483 Linde Group	Yes	GC	Anti-Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics	The Linde Corporate Responsibility Report 2008 Corporate Responsibility (Integrity Line) Code of Ethics	http://www.linde.com/international/web/linde/like35lindecom.nsf/repositorybyalias/cr_report_2008_en/\$file/cr_report_2008_en.pdf http://www.linde.com/international/web/linde/like35lindecom.nsf/docbyalias/nav_InterLinePortal http://www.linde.com/international/web/linde/like35lindecom.nsf/repositorybyalias/cr_ec_coe/\$file/CodeOfEthics_070911.pdf
484 Galp Energia	No						No information displayed on Homepage
485 ZF Friedrichshafen	No						No information displayed on Homepage
486 Royal KPN	Yes		n/a	Whistleblowing	Company Code, Group Compliance Officer	Sustainability Report 2008 Whistleblower Procedure	http://www.kpn.com/verslaglegging08/MVO_verslag08/downloads/pdf/KPN_SustainabilityReport08.pdf http://www.kpn.com/web/file?uuiid=19c0777d-2f49-457c-9bf4-896807e6e145&owner=ae52efca-8115-4bc3-a511-3c97b13a0b8a
487 DirecTV Group	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Illegal/Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics and Business Conduct	Code of Ethics and Business Conduct	http://files.shareholder.com/downloads/DTV/604818916x0x169407/eb15c7c2-2203-420e-8bf8-6cf0dc3149ad/DTV_WebDoc_3407.pdf
488 Eiffage	No						No information displayed on Homepage
489 Xerox	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct - Employee Handbook, Ethics and Compliance Office	Our Commitment to Global Citizenship – The 2008 Report Code of Conduct - Employee Handbook	http://www.xerox.com/Static_HTML/citizenshipreport/2008/citizenshipreport08.pdf http://www.xerox.com/downloads/usa/en/ir_Code_of_Conduct_EmployeeHandbook.pdf
490 CHS	Yes		Employees Training	n/a	n/a	2008 CHS responsibility report	http://www2.chsinc.com/AnnualMeeting/AnnualReport2008/CHS_Stewardship.pdf
491 Heineken Holding	Yes		Anti-Corruption Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct	2007 Sustainability Report Sustainability Data Sheet 2007 Corporate Responsibility - Principles Code of Business Conduct Business Conduct Business Ethics Whistleblowing	http://www.sustainabilityreport.heineken.com/downloads/Heineken_SR07.pdf http://www.heinekeninternational.com/content/live/files/downloads/CorporateResponsibility/Datasheet2007.pdf http://www.heinekeninternational.com/businessprinciples.aspx http://www.heinekeninternational.com/content/live/files/downloads/CorporateResponsibility/Code%20of%20Business%20Conduct.pdf http://www.heinekeninternational.com/BUSINESSCONDUCTPOLICIES.aspx http://www.heinekeninternational.com/Business_ethics.aspx http://www.heinekeninternational.com/WHISTLEBLOWING.aspx
492 LyondellBasell Industries	No						No information displayed on Homepage
493 SABMiller	Yes	GC	n/a	Whistleblowing	Code of Business Conduct and Ethics Compliance (New Rules of Conduct), Compliance Officers, Compliance Committee	Whistleblowing	http://www.sabmiller.com/index.asp?pageid=9
494 Mitsui OSK Lines	Yes	GC	Anti-Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action		Environmental and Social Report 2008 Compliance (New Rules of Conduct)	http://www.mol.co.jp/csr-e/img/kankyo2008.pdf http://www.mol.co.jp/compliance-e.shtml
495 United States Steel	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethical Business Conduct, Compliance Officer	2007 citizenship report Code of Ethical Business Conduct	http://www.uss.com/corp/company/profile/Citizens%20Report%202006.pdf http://www.uss.com/corp/company/ethics/CoEBC2008.pdf
496 Weyerhaeuser	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics	2006 SUSTAINABILITY PERFORMANCE REPORT Code of Ethics	http://www.weyerhaeuser.com/pdfs/sustainability/downloads/Governance.pdf http://www.weyerhaeuser.com/pdfs/sustainability/codeofethics.pdf
497 Isuzu Motors	No						No information displayed on Homepage
498 Thales Group	Yes	GC	Anti-Corruption Policy, Employees Training	n/a	Code of Ethics, Ethics and Corporate Responsibility Department	Corporate Responsibility Annual Report 2007	http://www.thalesgroup.com/docfile/dyn/12345678LANGCCCCDDDDDEEEEEEEEEEE01:22284F1B5215277F7037586A34290928:5E417C493D235B6D1E692E103E4D603B
499 Lenovo Group	Yes		n/a	Whistleblowing, Disciplinary Action	Business Conduct Guidelines	Sustainability Report FY 2007/08 Global Procurement	http://www.lenovo.com/social_responsibility/us/en/sustainability_report_2008.pdf http://www.pc.ibm.com/ww/lenovo/procurement/principles_practices.html
500 Fluor	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Conduct and Ethics, Compliance and Ethics Committee	Code of Business Conduct and Ethics Anti-Bribery and Corruption Policy	http://www.fluor.com/SiteCollectionDocuments/HR700.pdf http://www.fluor.com/SiteCollectionDocuments/in_abac_policy.pdf