

Rank	Company	Corporate Anti-Corruption Policies	Global Compact	Measures	Practices	Implementation Mechanisms	Source(s)	Link	Comments
101	Robert Bosch	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct, Compliance Officer	Corporate Social Responsibility Report 2007/2008 Code of Business Conduct	http://csr.bosch.com/content/language2/downloads/Bosch_CSR_Report_2007-2008.pdf http://csr.bosch.com/content/language2/downloads/Bosch_Code_of_Business_Conduct_en.pdf	
102	Target	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing	Code of Conduct	Corporate Responsibility Report 2007 Business Conduct Guide	http://sites.target.com/images/corporate/about/responsibility_report/responsibility_report_full.pdf http://media.corporate-ir.net/media_files/irol/65/65828/BusinessConductGuideExemptF3612030109.pdf	
103	Aegon	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Group Compliance Officer	Corporate Responsibility Report 2007 Code of Conduct	http://www.aegon.com/Documents/AEGON/Corporate%20responsibility/2007%20Corporate%20Responsibility%20Report.pdf http://www.aegon.com/Documents/AEGON/Corporate%20responsibility/Code%20of%20Conduct%202008.pdf	
104	State Farm Insurance Cos.	Yes		Anti-Bribery Policy, Prevention of Money Laundering and Kickbacks and Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Conduct	http://www.statefarm.com/about/media/intro_code.asp	
105	WellPoint	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ethics and Compliance Department	Standards of Ethical Business Conduct	http://media.corporate-ir.net/media_files/irol/13/130104/corpgov1/2008_WellPoint_Standards.pdf	
106	Dell	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Chief Ethics and Compliance Officer, Ombuds Officer	Corporate Responsibility Report 2008 Code of Conduct	http://www.dell.com/downloads/global/corporate/enviro/report2008.pdf http://www.dell.com/downloads/global/corporate/vision_national/code_of_conduct.pdf	
107	Johnson & Johnson	Yes		Anti-Bribery Policy	Giftmanagement, Whistleblowing	Code of Conduct	2007 Sustainability Report Johnson & Johnson Policy On Business Conduct	http://www.jnj.com/wps/wcm/connect/b92d59804ae70ee5bc98f0f0a50cf8/2007-sustainability-report.pdf?MOD=AJPERES http://www.investor.jnj.com/governance/conduct.cfm	
108	Marathon Oil	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	2007 Corporate Social Responsibility Report Code of Business Conduct	http://www.marathon.com/content/documents/social_responsibility/living_our_values_reports/lov_report_2007_final.pdf http://www.marathon.com/content/documents/investor_center/corporate_governance/code_ethics_2006_rev.pdf http://www.enel.it/azienda_en/sostenibilita/bilanci_sostenibilita/doc/sostenibilita_2007_ing.pdf http://www.enel.it/azienda_en/chi_siamo/codice_etico_3/download/doc/eticoInglese.zip	
109	Enel	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics, Compliance Officer	Reporting breaches of the Code of Ethics	http://www.enel.it/azienda_en/chi_siamo/codice_etico_3/segnalazione_responsabile/	
110	Saint-Gobain	Yes	GC	Anti-Corruption Policy	n/a	n/a	Respect for the law	http://www.saint-gobain.com/en/group/our-values/respect-law	
111	Lloyds TSB Group	Yes	GC	n/a	Whistleblowing	n/a	Corporate Responsibility Report 2007	http://lloydstsb.com/media/lloydstsb2004/pdfs/corporate_report_2007.pdf	
112	CNP Assurances	Yes	GC	Prevention of Money Laundering	n/a	Ethics & Compliance Unit, Code of Conduct, Code of Ethics	2007 Annual Report and Sustainable Development Report	http://thomson.mobular.net/thomson/7/2733/3316/print/AR07_EN.pdf	
113	Lehman Brothers Holdings	No					Responsibility Report 2007	http://www.rwe.com/generator.aspx/konzern/verantwortung/daten-und-dialog/publikationen/downloads/property=Data/id=626460/unsere-verantwortung-2007-en.pdf http://www.rwe.com/generator.aspx/konzern/property=Data/id=266710/en-download.pdf	In 2008 Lehman Brothers Holdings Inc. has filed for bankruptcy protection in the U.S., hence no information displayed on website.
114	RWE	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing	Code of Conduct, Compliance Officer	RWE Code of Conduct		
115	Nippon Life Insurance	No							No information displayed on Homepage
116	Indian Oil	Yes	GC	Anti-Corruption Policy, Employees Training	Whistleblowing, Giftmanagement	Code of Conduct	Sustainability Report 2007-08 Outlook Sustainability Report 2007-08 Community Code of Conduct	http://www.iocl.com/Aboutus/SustainabilityOutlook.pdf http://www.iocl.com/Aboutus/Community.pdf http://www.iocl.com/print/talktous/Codeofconduct.htm	
117	Nippon Oil	Yes		Employees Training	n/a	Code of Conduct	CSR Report 2008	http://www.eneos.co.jp/english/company/current_csr_report/pdf/ene_csr2008_all_eng.pdf	
118	Mitsubishi UFJ Financial Group	Yes	GC	Anti-corruption policy, Prevention of Money Laundering	n/a	Code of Conduct, Compliance Committee, Chief Compliance Officer	Corporate Social Responsibility Report 2008 - Supplementary Report Code of Conduct	http://www.mufg.jp/english/csr/csrreport/2008/pdf/iref/all_e.pdf http://www.mufg.jp/english/profile/ethics/	
119	Renault	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Whistleblowing, Giftmanagement	Code of Conduct, Compliance Officer	Code of Good Conduct 2007 Registration Document	http://www.renault.com/en/Lists/ArchivesDocuments/Renault%20-%20Code%20of%20ethics%20-%20en.pdf http://www.renault.com/en/Lists/ArchivesDocuments/Renault%20-%202007%20Registration%20Document.pdf	
120	Wachovia Corp.	No							On December 31, 2008, Wells Fargo acquired Wachovia Corporation
121	Zurich Financial Services	No							No information displayed on Homepage
122	Unilever	Yes	GC	Anti-Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Principles, Code of Business Principles Compliance Committee	Sustainable Development Report 2007 - Introduction Sustainable Development Report 2007 - People & Partners Code of Business Principles Code of Business Principles Hotline	http://www.unilever.com/Images/es_intro_tcm181-130764.pdf http://www.unilever.com/Images/es_people_tcm181-130779.pdf http://www.unilever.com/Images/ir_Code-of-Business-Principles-November-2006_tcm181-12290.pdf http://www.unilever.com/Images/ir_Code_of_Business_Principles_Hotline_tcm181-12291.pdf	
123	United Technologies	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics, Ombudsman	2007 Corporate Responsibility Report	http://www.utc.com/utc/Static%20files/Company%20Reports/Corporate%20Responsibility%20Reports/2007/2007_utc_corporate_resp_onsibility.pdf http://www.utc.com/utc/Static%20files/Governance/coe_english.pdf	
124	Groupe Caisse d'Épargne	Yes	GC	Anti-Corruption Policy, Preventing of Money Laundering and Financing Terrorism	n/a	n/a	Rapport Developpement Durable 2006 Compliance	http://www.groupe.caisse-epargne.com/cpp/101/fra/blob/ra_dd_06_ci_070918164554.pdf http://www.groupe.caisse-epargne.com/asp/ci_modele2.aspx?np=conformite_ci	Report partly in French language
125	Walgreen	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Walgreen Co. Ethics Policy Statement	http://files.shareholder.com/downloads/WAG/485926332x0x145604/14561bf9-f748-4a6e-a9ea-ba2489876aed/ethics.pdf	
126	Wells Fargo	Yes		Anti-Corruption Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Ethics and Business Conduct	https://www.wellsfargo.com/downloads/pdf/about/team_member_code_of_ethics.pdf	

127	EADS	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Economic Crime, Employees Training	Giftmanagement	Code of Conduct, Ethics Committee	Business, Legal and Corporate Responsibility 2007 (Book 3) Integrity: EADS Code of Ethics	http://www.reports.eads.net/2007/en/s/downloads/files/business_legal_responsibility_eads_ar07.pdf http://www.eads.net/xml/content/OF0000000400004/2/67/41323672.pdf
128	Dow Chemical	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Questionable Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct	Global Reporting Initiative Report 2007 Code of Business Conduct	http://www.dow.com/commitments/pdf/GRI091508.pdf http://www.dow.com/PublishedLiterature/dh_004f/0901b8038004f2bd.pdf?filepath=about/pdfs/noreg/473-00001.pdf&fromPage=GetDoc
129	MetLife	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Employee Code of Business Conduct and Ethics	Employee Code of Business Conduct and Ethics	http://www.metlife.com/assets/cao/chairman/governance/conduct/employee-code-of-business-conduct-and-ethics.pdf
130	Mitsubishi	Yes		Prevention of Money Laundering	Giftmanagement, Whistleblowing	Code of Conduct, Compliance Officer	Mitsubishi Corporation Code of Conduct	http://www.mitsubishicorp.com/en/pdf/about/philosophy/philosophy02/conduct080118e.pdf
131	A.P. Møller-Mærsk Group	No						No information displayed on Homepage
132	Hon Hai Precision Industry	No						No information displayed on Homepage
133	Industrial & Commercial Bank of China	Yes		Anti-Bribery Policy, Prevention of Money Laundering, Employees Training	n/a	n/a	2007 Corporate Social Responsibility Report Anti-Money Laundering Announcement	http://www.icbc.com.cn/icbc/html/download/nb/2008/shehuizerenbaogao_2007e.pdf http://www.icbc.com.cn/icbc/about%20us/anti-money%20lauding%20announcement/
134	Banco Bilbao Vizcaya Argentaria	Yes	GC	Prevention of Money Laundering and Financing Terrorism	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Office	Annual Report 2007 - Corporate Responsibility BBVA Group Code of Conduct	http://www.bbva.com/TLBB/fbin/IARC%202007%20ing_tcm61-161031.pdf http://www.bbva.com/TLBB/fbin/Codigo_02_Ingles_OK_tcm61-161891.pdf
135	PTT	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Disciplinary Action	Code of Conduct	Corporate Governance Handbook	http://www.pttplc.com/Files/PTT_book/CG_Book_eng.pdf
136	Microsoft	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Microsoft Standards of Business Conduct	http://download.microsoft.com/download/6/5/f/65f1aced-0ca6-4855-82ac-b10475d556d8/business_conduct.doc
137	Royal Ahold	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer, Compliance Committee	Ahold Global Code of Professional Conduct and Ethics	http://www.ahold.com/files/aholdglobalcode-eng.pdf
138	Sears Holdings	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance and Ethics Officer	Code of Conduct	http://www.searsholdings.com/govern/code_text.htm
139	Groupe Auchan	No						No information displayed on Homepage
140	Mitsui	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance Officer	CSR Report 2007 Business Conduct Guidelines for Employees and Officers	http://www.mitsui.co.jp/en/csr/report/detail/_icsFiles/afidfile/2008/05/07/csr2007_e_1.pdf http://www.mitsui.co.jp/en/company/governance/04/index.html
141	Seven & I Holdings	Yes		n/a	Whistleblowing	Corporate Ethics and Compliance Sub-Committee	CSR Report 2007	http://www.7andi.com/en/csr/pdf/2007/2007_01_all.pdf
142	United Parcel Service	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Corporate Compliance Officer	2007 UPS Corporate Sustainability Report Code of Business Conduct	http://www.sustainability.ups.com/docs/2007_CSR_PDF_Report.pdf http://pressroom.ups.com/pix/Code.pdf
143	Pfizer	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance Officer, Corporate Compliance Committee	2007 Corporate Responsibility Report Pfizer Policies on Business Conduct	http://media.pfizer.com/files/corporate_citizenship/cr_report_2007.pdf http://www.pfizer.com.au/Media/PfizerPolicyBusinessConduct.pdf
144	Intesa Sanpaolo	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering and Financing Terrorism, Employees Training	Disciplinary Action, Whistleblowing	Code of Ethics	Social Report 2007 Code of Ethics	http://group.intesasanpaolo.com/portalsir0/isInvestor/en_sostenibilita/BilancioSociale07_en.pdf http://group.intesasanpaolo.com/portalsir0/isInvestor/en_sostenibilita/CodiceEtico_en.pdf
145	Lowe's	Yes		Anti-Corruption Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	CODE OF BUSINESS CONDUCT AND ETHICS	http://www.shareholder.com/lowes/ethics.cfm
146	Tokyo Electric Power	Yes		Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Corporate Code of Conduct, Corporate Ethics Committee	Sustainability Report 2008 Corporate Code of Conduct	http://www.tepco.co.jp/en/challenge/enviro/pdf-1/08report-e.pdf http://www.tepco.co.jp/en/corpinfo/overview/pdf-1/kizyun-e.pdf
147	Rabobank	Yes	GC	Anti-Corruption Policy, Prevention of Money Laundering	Whistleblowing	Code of Conduct, Compliance Department, Compliance Officer	Annual Sustainability Report 2007 Annual Sustainability Review 2007	http://www.sustainabilityreport2007rabobank.com/Downloads/Maatschappelijk_jaarverslag_Rabobank_Groep_2007_UK.pdf http://www.sustainabilityreport2007rabobank.com/Downloads/Maatschappelijk_jaarbericht_Rabobank_Groep_2007_UK.pdf
148	China Mobile	Yes	GC	Anti-Corruption Policy, Employees Training	n/a	Code of Conduct	China Mobile Communications Corporation 2008 CSR Report	http://www.chinamobile.com/en/mainland/corporate/2008csr_en/download/cmcc2008csr_en.zip
149	Fujitsu	Yes		Anti-Corruption and Bribery Policy	n/a	Code of Conduct, Compliance Committee	FUJITSU GROUP SUSTAINABILITY REPORT 2008	http://www.fujitsu.com/downloads/ECO/rep2008/fujitsureport2008-e.pdf
150	Time Warner	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer, Ethics and Compliance Representatives	2008 CORPORATE SOCIAL RESPONSIBILITY REPORT CORPORATE STANDARDS OF BUSINESS CONDUCT	http://www.timewarner.com/corp/corp_governance/pdf/SBC_External_062205.pdf
151	GlaxoSmithKline	Yes	GC	Anti-Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Corporate Responsibility Report of 2007 Code of Conduct Corporate Ethics and Compliance Programme	http://www.gsk.com/responsibility/cr-review-2007/downloads/CR-Report-2007.pdf http://www.gsk.com/about/downloads/Policy-Code-Conduct.pdf http://www.gsk.com/about/corp-gov-ethics.htm
152	Caterpillar	Yes		Anti-Bribery Policy, Prevention of Kickbacks and Improper Payments	Giftmanagement, Whistleblowing	Code of Conduct	Worldwide Code of Conduct	http://www.cat.com/cda/files/853384/7/2005_code_body_EnglishFull.pdf
153	Veolia Environnement	Yes	GC	Anti-Corruption Policy	Giftmanagement, Whistleblowing	Ethics Committee, Ethics, Commitment and Responsibility	Ethics, Commitment and Responsibility Ethics Committee Referrals	http://www.veoliaenvironnement.com/media/ethics-programme_en.pdf http://www.veoliaenvironnement.com/en/group/governance/ethics/referrals.aspx

154	AEON	No							No information displayed on Homepage
155	Bayer	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Sustainable Development Report 2007 Corporate Compliance Policy	http://www.sustainability2007.bayer.com/en/Sustainable-Development-Report-2007.pdf http://www.bayer.com/en/Corporate-Compliance-english.pdf	
156	Medco Health Solutions	Yes		Anti-Bribery Policy, Prevention of Kickbacks, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Compliance Officer, Corporate Compliance Committee	Standards of Business Conduct, Corporate Compliance and Ethics Office	http://media.corporate-ir.net/media_files/irol/13/131268/corpgov/standards_business_conduct.pdf	
157	Supervalu	Yes		n/a	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	Code of Ethics, Corporate Compliance Officer	http://media.corporate-ir.net/media_files/irol/93/93272/corpgov/code-of-ethics.pdf	
158	Archer Daniels Midland	Yes		Anti-Corruption Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Business Code of Conduct and Ethics, Office of Compliance and Ethics	http://www.adm.com/company/Documents/The-ADM-Way-English.pdf	
159	China Life Insurance	No							Website published only in Chinese Language
160	Telecom Italia	Yes	GC	n/a	Whistleblowing, Disciplinary Action	Code of Ethics	CODE OF ETHICS OF THE TELECOM ITALIA GROUP Whistleblowing Statement	http://www.telecomitalia.it/TIPortale/docs/investor/Code_of_Ethics_Feb09.pdf http://www.telecomitalia.com/cgi-bin/tiportale/TIPortale/ep/browse.do?tabId=4&pageTypeId=-12695&LANG=EN&channelId=-14161&channelPage=ep/channel/default.jsp	
161	Fannie Mae	Yes		Anti-Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Conduct	http://www.fanniemae.com/aboutfm/pdf/codeofconduct.pdf	
162	Freddie Mac	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Illegal Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Conduct for Employees	http://www.freddiemac.com/governance/pdf/employee_code_conduct.pdf	
163	Deutsche Bahn	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Economic Crime, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance Officer, Ombudsman	Texte zum Nachhaltigkeitsbericht 2007 Compliance Bericht 2006-2007	http://www.deutschebahn.com/site/shared/de/dateianhaenge/berichte/nachhaltigkeitsbericht2007.pdf http://www.deutschebahn.com/site/shared/de/dateianhaenge/berichte/compliance_bericht06_07.pdf	Report in German language
164	Safeway	Yes		Anti-Bribery Policy, Kickback Prevention	Whistleblowing, Disciplinary Action	Code of Conduct	2007 Corporate Social Responsibility Report Code of Business Conduct and Ethics	http://media.corporate-ir.net/media_files/irol/64/64607/Corp_Social07.pdf http://media.corporate-ir.net/media_files/irol/64/64607/governance/CodeofConduct_3142005.pdf	
165	Nippon Steel	No							No information displayed on Homepage
166	BT	Yes	GC	Anti-Corruption Policy, Employees Training	Whistleblowing, Disciplinary Action	Code of Conduct	BT's Sustainability Report 2008 The Way We Work - A statement of business practice	http://www.btplc.com/Societyandenvironment/Ourapproach/Sustainabilityreport/pdf/2008/FullReport.pdf http://www.btplc.com/TheWayWeWork/Businesspractice/twww_english.pdf	
167	Volvo	Yes	GC	n/a	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Code of Conduct	http://www.volvo.com/vce/vebiz2webauthor/sharepoint/docfetch.aspx?docID=59&listID=a560d670-9b7a-40ff-845b-f34973fc7493&area=VolvoCom%20Volvo%20Group	
168	Sunoco	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	CODE OF BUSINESS CONDUCT AND ETHICS	CODE OF BUSINESS CONDUCT AND ETHICS	http://media.corporate-ir.net/media_files/irol/99/99437/codeofconduct.pdf	
169	Vinci	Yes	GC						No further information displayed on Homepage
170	Lockheed Martin	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Office of Ethics and Business Conduct, Ethics Officer	Code of Ethics and Business Conduct	http://www.lockheedmartin.com/data/assets/corporate/documents/ethics/setting-the-standard.pdf	
171	China Construction Bank	No							No information displayed on Homepage
172	Bouygues	Yes	GC	Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Group Ethics Officer	Sustainable Development Report 2007 Group Code of Ethics	http://www.publications-bouygues-construction.com/docs/_/BouyguesConstructionRapportDD2007En/catalogue.pdf http://www.bouygues.com/en/press-room/publications/code-of-ethics/code-of-ethics/	
173	Sumitomo Mitsui Financial Group	No							No information displayed on Homepage
174	NEC	Yes	GC	Anti-Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	NEC CSR Digest 2008 NEC Group Code of Conduct	http://www.nec.co.jp/csr/en/report/pdf/CSR-all2008.pdf http://www.nec.co.jp/csr/en/management/code.html	
175	Roche Group	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments	Giftmanagement, Whistleblowing	Code of Conduct, Group Compliance Officer	Behaviour in Business Compliance Officer Statement	http://www.roche.com/behaviour_in_business.pdf http://www.roche.com/about_roche/corporate_governance/code_of_conduct/compliance_officer.htm	
176	Sprint Nextel	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing	Code of Conduct	Sprint Nextel Code of Conduct for Consultants, Contractors and Suppliers	http://www.sprint.com/governance/docs/supplier_code_of_conduct_20060421.pdf	
177	Best Buy	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Ethics Advisory Council, Ethics Office	Code of Business Ethics	http://media.corporate-ir.net/media_files/irol/83/83192/bby_cobe_080121.pdf	
178	Sanofi-Aventis	Yes	GC	Anti-Corruption Policy, Prevention of Illegal Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Ethics Committee	Sustainability Report 2007_Edition Code of Ethics	http://en.sanofi-aventis.com/binaries/rdd_2007_en_tcm28-18111.pdf http://en.sanofi-aventis.com/binaries/Code_of_Ethics_en_tcm28-302.pdf	
179	Franz Haniel	No							No information displayed on Homepage
180	Dai-ichi Mutual Life Insurance	No							No information displayed on Homepage
181	Novartis	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Disciplinary Action	Code of Conduct, Group Compliance Officer	2007 GRI Report Code of Conduct	http://www.corporatecitizenship.novartis.com/downloads/managing-cc/novartis_2007_gri_report.pdf http://www.corporatecitizenship.novartis.com/downloads/business-conduct/code_of_conduct.pdf	

182	Mizuho Financial Group	Yes	GC	Employees Training	Whistleblowing	Code of Conduct, Compliance Committee	Whistleblowing Statement	http://www.mizuho-fg.co.jp/english/company/internal/compliance.html
183	BHP Billiton	Yes	GC	Anti-Corruption and Bribery Policy, Kickback and Facility Payment Prevention	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Global Ethics Panel	Sustainability Report 2008 Code of Business Conduct	http://www.bhpbilliton.com/bbContentRepository/docs/fullSustainabilityReport2008.pdf http://www.bhpbilliton.com/bbContentRepository/docs/workingWithIntegrity.pdf http://www.pepsico.com/Downloads/Sustainability-2007.pdf
184	PepsiCo	Yes		Anti-Corruption and Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	PepsiCo Corporate Sustainability Report 2006-2007 Worldwide Code of Conduct	http://www.pepsico.com/Downloads/Worldwide-Code-Of-Conduct/ENGLISH_08.pdf
185	Landesbank Baden-Württemberg	Yes		Anti-corruption policy, Money Laundering Prevention	Disciplinary Action	n/a	Sustainability Report 2006/2007 Anti Money Laundering	http://www.lbbw.de/imperia/md/content/lbbwde/engagement/nachhaltigkeit/sustainability_report_2007.pdf http://www.lbbw.de/lbbwde/1000008166-en.html
186	Koç Holding	Yes	GC	n/a	n/a	Ethical Values and Code of Conduct		
187	Bank of China	No						No information displayed on Homepage
188	Intel	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ethics and Compliance Oversight Committee	Intel 2007 Corporate Responsibility Report Code of Conduct	http://download.intel.com/intel/cr/gcr/pdf/07CR_report.pdf http://www.intel.com/intel/finance/docs/code-of-conduct.pdf
189	Canon	Yes		Employees Training	Whistleblowing	Group Code of Conduct, Corporate Ethics and Compliance Committee	Canon Sustainability Report 2008	http://www.canon.com/environment/report/pdf/report2008e.pdf
190	Altria Group	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Code of Conduct for Compliance and Integrity	http://www.altria.com/download/pdf/responsibility_Altria_Code_of_Conduct.pdf
191	Bunge	Yes		Prevention of Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	Code of Ethics Whistleblower Statement	http://phx.corporate-ir.net/phoenix.zhtml?c=130024&p=irol-govConduct http://phx.corporate-ir.net/phoenix.zhtml?c=130024&p=irol-rprtviolations
192	Tyco International	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Fraud	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ombudsman	Tyco Guide to Ethical Conduct	http://www.tyco.com/TycoWeb/WWW/Documents/pdf/tyco_guide_to_ethical_conduct.pdf
193	Gaz de France	Yes						see #97 GdF Suez
194	Royal Bank of Canada	Yes		Anti-corruption policy, Prevention of Money Laundering and Financing Terrorism and Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Ombudsman	2007 Corporate Responsibility Report Code of Conduct Anti-Corruption Policies	http://www.rbc.com/responsibility/pdf/RBC-2007report-e.pdf http://www.rbc.com/governance/pdf/RBCCodeOfConduct.pdf http://www.rbc.com/responsibility/governance/anti-corruption.html
195	Kraft Foods	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Code of Conduct for Compliance and Integrity	http://www.kraft.com/assets/pdf/KraftFoods_CodeofConduct.pdf
196	Commerzbank	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Fraud and Money Laundering, Employees Training	Giftmanagement, Disciplinary Action	Code of Conduct	Corporate Responsibility Report 2007 THE BUSINESS CONDUCT GUIDELINES OF COMMERZBANK AG	https://www.commerzbank.com/media/konzern/engagement/strategie/2007_CR-Bericht_e.pdf https://www.commerzbank.com/media/en/konzern/konzerninfo/verhaltensrichtlinie/code_conduct_employee_en.pdf
197	Royal Philips Electronics	Yes	GC	Anti-Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer	Sustainability Report 2007 General Business Principles GBP Directives	http://www.philips.com/shared/assets/Downloadablefile/sustainabilitydownloads/report2007.pdf http://www.philips.com/shared/assets/Investor_relations/pdf/businessprinciples/GeneralBusinessPrinciples.pdf http://www.philips.com/shared/assets/Investor_relations/pdf/businessprinciples/GBP_Directives_08.pdf
198	Allstate	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper or Illegal Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Compliance Officer	Code of Ethics	http://media.corporate-ir.net/media_files/IROL/93/93125/Code_of_Ethics.pdf
199	KfW Bankengruppe	Yes		Anti-Corruption Policy, Prevention of Money Laundering and Financing Terrorism, Employees Training	n/a	Code of Conduct	Sustainability Report 2007 Corruption Prevention Statement Money Laundering Prevention Statement	http://www.kfw.de/DE_Home/Service/Download_Center/Allgemeine_Publikationen/PDF-Dokumente_Umweltschutz_-_Karriere/NB_2006_E.pdf http://www.kfw.de/EN_Home/KfW_Bankengruppe/Our_Actions/Corruption.jsp http://www.kfw.de/EN_Home/KfW_Bankengruppe/Our_Actions/MoneyLaund.jsp
200	Motorola	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering and Financing Terrorism and Improper Payments, Employees Training	Whistleblowing, Giftmanagement	Code of Conduct	Corporate Responsibility Report 2007 Code of Business Conduct	http://www.motorola.com/mot/doc/7/7130_MotDoc.pdf http://www.motorola.com/mot/doc/7/7175_MotDoc.pdf