

Rank	Company	Corporate Anti-Corruption Policies	Global Compact	Measures	Practices	Implementation Mechanisms	Source(s)	Link	Comments
301	Enterprise GP Holdings	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Standards of Business Conduct, Corporate Policies	Code of Conduct, Standards of Business Conduct, Corporate Policies	<a href="http://www.enterprisegp.com/pdfs/CodeofConduct_04-18-07.pdf">http://www.enterprisegp.com/pdfs/CodeofConduct_04-18-07.pdf</a> <a href="http://www.enterprisegp.com/pdfs/EPE_StandardsofBusinessConduct.pdf">http://www.enterprisegp.com/pdfs/EPE_StandardsofBusinessConduct.pdf</a> <a href="http://www.enterprisegp.com/pdfs/EPCO_Corporate_Policies.pdf#FairDisclosure">http://www.enterprisegp.com/pdfs/EPCO_Corporate_Policies.pdf#FairDisclosure</a>	
302	Cosmo Oil	Yes	GC	Anti-Bribery Policy, Prevention of Improper Monetary Donations and Payoffs, Employees Training	Whistleblowing, Giftmanagement	Code of Conduct	Sustainability Report 2008 Code of Conduct	<a href="http://www.cosmo-oil.co.jp/eng/csr/sustain/pdf/2008/sus08e_all.pdf">http://www.cosmo-oil.co.jp/eng/csr/sustain/pdf/2008/sus08e_all.pdf</a> <a href="http://www.cosmo-oil.co.jp/eng/company/guideline.html">http://www.cosmo-oil.co.jp/eng/company/guideline.html</a>	
303	China FAW Group	No							No information displayed on Homepage
304	Macy's	Yes		Anti-Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Office of Compliance and Ethics	Code of Conduct Compliance and Ethics Program Vendor - Employee Conflict of Interest Macys ComplianceConnection	<a href="http://www.macysinc.com/investors/governance/documents/code_of_conduct.pdf">http://www.macysinc.com/investors/governance/documents/code_of_conduct.pdf</a> <a href="http://www.macysinc.com/AboutUs/Policies/ComplianceEthics.aspx">http://www.macysinc.com/AboutUs/Policies/ComplianceEthics.aspx</a> <a href="http://www.macysinc.com/AboutUs/Policies/Conflict.aspx">http://www.macysinc.com/AboutUs/Policies/Conflict.aspx</a> <a href="https://www.macyscomplianceconnections.com/">https://www.macyscomplianceconnections.com/</a>	
305	Delphi	Yes		Anti-Corruption and Bribery Policy, Prevention of Improper Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Business Conduct Standards, Chief Compliance Officer	Business Conduct Standards	<a href="http://delphi.com/pdf/FoundationforExcellence10Jan2007.pdf">http://delphi.com/pdf/FoundationforExcellence10Jan2007.pdf</a>	
306	Delhaize Group	Yes		Anti-Bribery Policy, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Corporate Governance Charter of Delhaize Group	Corporate Governance Charter of Delhaize Group	<a href="http://www.delhaizegroup.com/LinkClick.aspx?fileticket=oTQATaDixtE%3d&amp;tabid=94">http://www.delhaizegroup.com/LinkClick.aspx?fileticket=oTQATaDixtE%3d&amp;tabid=94</a>	
307	Magna International	Yes		Anti-Bribery Policy, Prevention of Kickbacks and Improper Benefits	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct and Ethics	Code of Conduct and Ethics	<a href="http://www.magna.com/magna/en/investors/governance/documents/pdf/Magna_Code_of_Conduct.pdf">http://www.magna.com/magna/en/investors/governance/documents/pdf/Magna_Code_of_Conduct.pdf</a>	
308	Travelers Cos.	Yes		Anti-Corruption and Bribery Policy, Prevention of Unusual or Illegal Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Business Conduct and Ethics, Compliance Officer	Code of Business Conduct and Ethics	<a href="http://www.travelers.com/wcm/trv/docs/codeofconduct.pdf">http://www.travelers.com/wcm/trv/docs/codeofconduct.pdf</a>	
309	Liberty Mutual Insurance Group	No							No information displayed on Homepage
310	William Morrison Supermarkets	No							No information displayed on Homepage
311	Hartford Financial Services	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics and Business Conduct, Director of Compliance, Business Compliance Officer	Code of Ethics and Business Conduct	<a href="http://www.thehartford.com/higfiles/pdf/CodeHIG.pdf">http://www.thehartford.com/higfiles/pdf/CodeHIG.pdf</a>	
312	Abbott Laboratories	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Compliance Officer	2007 Global Citizenship Report Code of Conduct Training & Performance Data	<a href="http://www.abbott.com/static/content/document/gc_report_2007.pdf">http://www.abbott.com/static/content/document/gc_report_2007.pdf</a> <a href="http://www.abbott.com/static/content/document/COBC_English.pdf">http://www.abbott.com/static/content/document/COBC_English.pdf</a> <a href="http://www.abbott.com/global/ur/content/en_US/40.20.10.15:15/general_content/General_Content_00310.htm">http://www.abbott.com/global/ur/content/en_US/40.20.10.15:15/general_content/General_Content_00310.htm</a>	
313	Cepsa	Yes	GC	Anti-Corruption and Bribery Policy	n/a	n/a	Summary 2007 Corporate Responsibility Report	<a href="http://www.cepsa.com/corporativo/doc/c_1_48/informe_responsabilidad_2007_Ingles.pdf">http://www.cepsa.com/corporativo/doc/c_1_48/informe_responsabilidad_2007_Ingles.pdf</a>	
314	Groupama	No							No information displayed on Homepage
315	Tata Steel	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Improper Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ethics Counsellor	CSR-Report 06/07	<a href="http://www.tatasteel.com/corporatesustainability/pdf/CSR-06-07.pdf">http://www.tatasteel.com/corporatesustainability/pdf/CSR-06-07.pdf</a>	
316	Bertelsmann	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Kickbacks	Giftmanagement, Whistleblowing	Code of Conduct, Ombudsperson, Ethics and Compliance Representative (Center)	Code of Conduct	<a href="http://benet.bertelsmann.com/imagescom/Code_of_Conduct_English_tcm12-189653.pdf">http://benet.bertelsmann.com/imagescom/Code_of_Conduct_English_tcm12-189653.pdf</a>	
317	Mitsubishi Chemical Holdings	Yes	GC	Anti-Bribery Policy, Employees Training	Giftmanagement, Whistleblowing	Group Corporate Ethics, Group Compliance Code of Conduct, Chief Compliance Officer	CSR-Report 2008 Code of Conduct	<a href="http://www.mitsubishichem-hd.co.jp/english/csr/pdf/20081204-1.pdf">http://www.mitsubishichem-hd.co.jp/english/csr/pdf/20081204-1.pdf</a> <a href="http://www.mitsubishichem-hd.co.jp/english/csr/compliance.html#01">http://www.mitsubishichem-hd.co.jp/english/csr/compliance.html#01</a>	
318	Washington Mutual	No							No information displayed on Homepage
319	Commonwealth Bank of Australia	Yes		Anti-Corruption Policy, Prevention of Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Statement on Professional Practice Corporate Governance Anti-Money Laundering & Counter-Terrorism Financing	<a href="http://shareholders.commbank.com.au/group_display/0,1922,CH2221%255F5T11018,00.html">http://shareholders.commbank.com.au/group_display/0,1922,CH2221%255F5T11018,00.html</a> <a href="http://shareholders.commbank.com.au/group_display/0,1922,NI2221%255F5CH2221,00.html#ethical">http://shareholders.commbank.com.au/group_display/0,1922,NI2221%255F5CH2221,00.html#ethical</a> <a href="http://www.commbank.com.au/about-us/customer-commitment/practices/anti-money-laundering/default.aspx">http://www.commbank.com.au/about-us/customer-commitment/practices/anti-money-laundering/default.aspx</a>	
320	Humana	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Principles of Business Ethics, Chief Compliance Officer	Principles of Business Ethics	<a href="http://media.corporate-ir.net/media_files/irol/92/92913/pdf/Business_Ethics_Sep04.pdf">http://media.corporate-ir.net/media_files/irol/92/92913/pdf/Business_Ethics_Sep04.pdf</a>	
321	Massachusetts Mutual Life Insurance	Yes		Anti-Corruption Policy, Prevention of Money Laundering	Whistleblowing, Giftmanagement, Disciplinary Action	Ethics and Conduct	Corporate Responsibility Report Ethics and Conduct	<a href="http://www.massmutual.com/mmfg/pdf/cr_report.pdf">http://www.massmutual.com/mmfg/pdf/cr_report.pdf</a> <a href="http://www.massmutual.com/mmfg/pdf/employee_code.pdf">http://www.massmutual.com/mmfg/pdf/employee_code.pdf</a>	
322	Itochu	No							No information displayed on Homepage
323	Fujifilm Holdings	Yes		Anti-Corruption Policy, Employees Training	Giftmanagement, Disciplinary Action	Charter of Corporate Behavior, Code of Conduct	Sustainability Report Code of Conduct	<a href="http://www.fujifilmholdings.com/en/sustainability/pdf/2008/ff_sr_2008_all.pdf">http://www.fujifilmholdings.com/en/sustainability/pdf/2008/ff_sr_2008_all.pdf</a> <a href="http://www.fujifilmholdings.com/en/about/philosophy/law/honesty.html">http://www.fujifilmholdings.com/en/about/philosophy/law/honesty.html</a>	
324	CPC	No							No information displayed on Homepage

					Corporate Social Responsibility Report 2007 Business Guideposts	<a href="http://www.alcatel-lucent.com/flash/CSR/2007report_va/docs/all.pdf">http://www.alcatel-lucent.com/flash/CSR/2007report_va/docs/all.pdf</a> <a href="http://www.alcatel-lucent.com/wps/DocumentStreamerServlet?LMSG_CABINET=Docs_and_Resource_Ctr&amp;LMSG_CONTENT_FILE=Corp_Governance_Docs/BusinessGuideposts.pdf&amp;lu_lang_code=en_WW">http://www.alcatel-lucent.com/wps/DocumentStreamerServlet?LMSG_CABINET=Docs_and_Resource_Ctr&amp;LMSG_CONTENT_FILE=Corp_Governance_Docs/BusinessGuideposts.pdf&amp;lu_lang_code=en_WW</a> <a href="http://www.alcatel-lucent.com/wps/portal/ut/p/kcxml/04_Sj8SPykssy0xPLMnMz0vM0Y_QjzKLd4x3c3IDSYGYRq6m-pEoYgbxjggRX4_83FT9IH1v_QD9gtzQIHJHROUA1x1yVg!!/delta/base64xml/L3dJdyEvd0ZnQUFzQUwMNEIVRS82X0FIRkJF#N100A0">http://www.alcatel-lucent.com/wps/portal/ut/p/kcxml/04_Sj8SPykssy0xPLMnMz0vM0Y_QjzKLd4x3c3IDSYGYRq6m-pEoYgbxjggRX4_83FT9IH1v_QD9gtzQIHJHROUA1x1yVg!!/delta/base64xml/L3dJdyEvd0ZnQUFzQUwMNEIVRS82X0FIRkJF#N100A0</a>	
325 Alcatel-Lucent	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Business Guidepost, Ethics and Compliance, Statement of Business Principles, Guidelines	Statement of Business Principles Guidelines Directive anti-corruption	<a href="http://www.alcatel-lucent.com/sbp">http://www.alcatel-lucent.com/sbp</a> <a href="http://www.alcatel-lucent.com/wps/portal/AboutUs/csr/principles#tabAnchor4">http://www.alcatel-lucent.com/wps/portal/AboutUs/csr/principles#tabAnchor4</a> <a href="http://www1.alcatel-lucent.com/gsearch/accessFile.jhtml?sendURL=http%3A//www.alcatel-lucent.com/wps/DocumentStreamerServlet%3FLMSG_CABINET%3DDocs_and_Resource_Ctr%26LMSG_CONTENT_FILE%3DUser_Guides/Anti-Corruption_Policy_-_French.pdf%26lu_lang_code%3Den_WW&amp;sendCollection=RESOURCE_CENTER&amp;sendTitle=Anti+Corruption+Policy+French&amp;spacialColl=">http://www1.alcatel-lucent.com/gsearch/accessFile.jhtml?sendURL=http%3A//www.alcatel-lucent.com/wps/DocumentStreamerServlet%3FLMSG_CABINET%3DDocs_and_Resource_Ctr%26LMSG_CONTENT_FILE%3DUser_Guides/Anti-Corruption_Policy_-_French.pdf%26lu_lang_code%3Den_WW&amp;sendCollection=RESOURCE_CENTER&amp;sendTitle=Anti+Corruption+Policy+French&amp;spacialColl=</a>
Australia & New Zealand 326 Banking	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 & Ethics	Code of Conduct & Ethics ANZ GLOBAL ANTI-BRIBERY POLICY Anti-Money Laundering and Counter-Terrorism Financing Program ANZ GLOBAL FRAUD AND CORRUPTION POLICY ANZ Global Whistleblower Protection Policy	<a href="http://www.anz.com/documents/au/policies/ANZ-Employee-Code-of-Conduct.pdf">http://www.anz.com/documents/au/policies/ANZ-Employee-Code-of-Conduct.pdf</a> <a href="http://www.anz.com/documents/au/policies/ANZ_GLOBAL_ANTI-BRIBERY_POLICY.pdf">http://www.anz.com/documents/au/policies/ANZ_GLOBAL_ANTI-BRIBERY_POLICY.pdf</a> <a href="http://www.anz.com/Documents/AU/policies/ANZ_ANTI-MONEY_LAUNDERING_COUNTER_TERRORISM_FINANCING_PROGRAM.pdf">http://www.anz.com/Documents/AU/policies/ANZ_ANTI-MONEY_LAUNDERING_COUNTER_TERRORISM_FINANCING_PROGRAM.pdf</a> <a href="http://www.anz.com/documents/au/policies/ANZ_GLOBAL_FRAUD_AND_CORRUPTION%20POLICY.pdf">http://www.anz.com/documents/au/policies/ANZ_GLOBAL_FRAUD_AND_CORRUPTION%20POLICY.pdf</a> <a href="http://www.anz.com/documents/au/policies/ANZ_GLOBAL_WHISTLEBLOWER_PROTECTION_POLICY.pdf">http://www.anz.com/documents/au/policies/ANZ_GLOBAL_WHISTLEBLOWER_PROTECTION_POLICY.pdf</a>
327 3M	Yes		Anti-Corruption and Bribery Policy	Whistleblowing, Giftmanagement, Disciplinary Action	Business Conduct, Compliance Department	Business Conduct Policies	<a href="http://multimedia.mmm.com/mws/mediawebserver.dyn?6666660Zjcf6IVs6EVs66S7cECOrrrQ-">http://multimedia.mmm.com/mws/mediawebserver.dyn?6666660Zjcf6IVs6EVs66S7cECOrrrQ-</a>
328 Rite Aid	Yes		n/a	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics and Business Conduct	Code of Ethics and Business Conduct	<a href="http://www.riteaid.com/www.riteaid.com/w-content/images/company/governance/code_of_ethics.pdf">http://www.riteaid.com/www.riteaid.com/w-content/images/company/governance/code_of_ethics.pdf</a>
329 Hanwha	Yes		Anti-Corruption and Bribery Policy	n/a	Ethics Charter of Hanwha Corporation	Code of Ethics	<a href="http://english.hanwhacorp.co.kr/comp/ma/et/index.asp">http://english.hanwhacorp.co.kr/comp/ma/et/index.asp</a>
330 Softbank	Yes		Employees Training	Whistleblowing	Code of Conduct	Hotline (Internal Reporting System) Efforts on Penetration of Compliance	<a href="http://www.softbank.co.jp/en/initiatives/compliance/structure/index.html">http://www.softbank.co.jp/en/initiatives/compliance/structure/index.html</a> <a href="http://www.softbank.co.jp/en/initiatives/compliance/efforts/index.html">http://www.softbank.co.jp/en/initiatives/compliance/efforts/index.html</a>
331 GasTerra	Yes		n/a	Whistleblowing, Giftmanagement	Code of Conduct	Annual Social Report 2007	<a href="http://www.gasterra.com/notices/Documents/Annual%20reports/MJV_2007_ENG_def.pdf">http://www.gasterra.com/notices/Documents/Annual%20reports/MJV_2007_ENG_def.pdf</a>
332 Merck	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Improper Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct, Ethical Operating Standards Handbook, Ombudsman, Office of Ethics, Compliance Department	Corporate Responsibility 2006-2007 Report Code of Conduct Ethical Operating Standards Handbook	<a href="http://www.merck.com/corporate-responsibility/docs/cr2006-2007.pdf">http://www.merck.com/corporate-responsibility/docs/cr2006-2007.pdf</a> <a href="http://www.merck.com/about/code_of_conduct.pdf">http://www.merck.com/about/code_of_conduct.pdf</a> <a href="http://www.merck.com/about/pdf/eos_handbook.pdf">http://www.merck.com/about/pdf/eos_handbook.pdf</a>
333 Lafarge	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Disciplinary Action	Business Code of Conduct	Sustainability Report 2007 Business Code of Conduct	<a href="http://www.lafarge.com/05062008-publication-sustainability_report_2007-uk.pdf?xtmc=report&amp;xtmr=1">http://www.lafarge.com/05062008-publication-sustainability_report_2007-uk.pdf?xtmc=report&amp;xtmr=1</a> <a href="http://www.lafarge.com/lafarge/PUBLICATION/20041028/102804-Publication_group-Code_of_business_conduct-uk.pdf">http://www.lafarge.com/lafarge/PUBLICATION/20041028/102804-Publication_group-Code_of_business_conduct-uk.pdf</a>
334 Deere	Yes		Anti-Corruption and Bribery Policy, Prevention of Improper Payments, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Business Conduct Guidelines, Code of Ethics	Code of Ethics Business Conduct Guidelines	<a href="http://www.deere.com/en_US/ir/corporategovernance/ethics.html">http://www.deere.com/en_US/ir/corporategovernance/ethics.html</a> <a href="http://www.deere.com/en_US/ir/media/pdf/corporategovernance/English_Guidelines.pdf">http://www.deere.com/en_US/ir/media/pdf/corporategovernance/English_Guidelines.pdf</a>
335 Oil & Natural Gas	Yes	GC	n/a	Giftmanagement, Disciplinary Action	n/a	Code Of Conduct	<a href="http://www.ongcindia.com/investor_centre/code_of_conduct.pdf">http://www.ongcindia.com/investor_centre/code_of_conduct.pdf</a>
336 Bank of Nova Scotia	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism and Kickbacks	Whistleblowing, Giftmanagement, Disciplinary Action	Guidelines for Business Conduct, Compliance Department, Chief Compliance Officer	CSR-Report Guidelines for Business Conduct	<a href="http://www.scotiabank.com/images/en/files/aboutscotia/17460.pdf">http://www.scotiabank.com/images/en/files/aboutscotia/17460.pdf</a> <a href="http://www.scotiabank.com/images/en/files/personal/18492.pdf">http://www.scotiabank.com/images/en/files/personal/18492.pdf</a>
337 Apple	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Whistleblowing, Giftmanagement, Disciplinary Action	Business Conduct	Business Conduct	<a href="http://media.corporate-ir.net/media_files/irol/10/107357/corpGov/AAPL_BCPolicy_0108.pdf">http://media.corporate-ir.net/media_files/irol/10/107357/corpGov/AAPL_BCPolicy_0108.pdf</a>
338 Alstom	Yes		Anti-Corruption and Bribery Policy, Prevention of Unlawful Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Our Code of Ethics	Our Code of Ethics	<a href="http://www.alstom.com/home/about_us/code_of_ethics_files/file_43585_51500.pdf">http://www.alstom.com/home/about_us/code_of_ethics_files/file_43585_51500.pdf</a>
339 Iberdrola	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Sustainability Report 2007 Code of Professional Conduct	<a href="http://www.iberdrola.es/webibd/gc/prod/en/doc/InformeSostenibilidad2007.pdf">http://www.iberdrola.es/webibd/gc/prod/en/doc/InformeSostenibilidad2007.pdf</a> <a href="http://www.iberdrola.es/webibd/gc/prod/en/doc/codigoiberdrola.pdf">http://www.iberdrola.es/webibd/gc/prod/en/doc/codigoiberdrola.pdf</a>
340 Alliance Boots	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Facilitation Payments and Kickbacks	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct and Business Ethics	Code of Conduct and Business Ethics Marketplace Target Highlights	<a href="http://www.allianceboots.com/medialibrary/boots/Corporate%20Governance/Item%209%20Code%20of%20Conduct.pdf">http://www.allianceboots.com/medialibrary/boots/Corporate%20Governance/Item%209%20Code%20of%20Conduct.pdf</a> <a href="http://www.allianceboots.com/Social%20responsibilities/Highlights/Our%20marketplace%20target%20highlights">http://www.allianceboots.com/Social%20responsibilities/Highlights/Our%20marketplace%20target%20highlights</a>
341 China Railway Group	No						No information displayed on Homepage
342 Schneider Electric	Yes	GC					No further information displayed on Homepage
343 East Japan Railway	Yes		Employees Trainings	Whistleblowing	Compliance Action Plan	Sustainability Report 2008	<a href="http://www.jreast.co.jp/e/environment/pdf_2008/all.pdf">http://www.jreast.co.jp/e/environment/pdf_2008/all.pdf</a>
344 Quanta Computer	No						No information displayed on Homepage
345 Aisin Seiki	Yes		n/a	Giftmanagement, Disciplinary Action	Business Ethics Guidelines, Business Ethics Committee, Charter of Corporate Behavior	Business Ethics Guidelines Charter of Corporate Behavior	<a href="http://www.aisin.com/profile/comp/guide.html">http://www.aisin.com/profile/comp/guide.html</a> <a href="http://www.aisin.com/profile/comp/kensho.html">http://www.aisin.com/profile/comp/kensho.html</a>
346 Christian Dior	No						No information displayed on Homepage
347 Kansai Electric Power			Employees Training	Whistleblowing	Compliance Manual, Compliance Committee Secretariat	CSR-Report 2008	<a href="http://www.kepco.co.jp/english/action/pdf2008/e2008.pdf">http://www.kepco.co.jp/english/action/pdf2008/e2008.pdf</a>
348 Poste Italiane	Yes		n/a	Giftmanagement, Disciplinary Action	Code of Ethics	Code of Ethics	<a href="http://www.poste.it/en/azienda/chi_siamo/Code_of_Ethics.pdf">http://www.poste.it/en/azienda/chi_siamo/Code_of_Ethics.pdf</a>
349 Noble Group	No						No information displayed on Homepage
350 Mitsubishi Motors	Yes		Employees Training	Whistleblowing	Business Ethics of Mitsubishi Motors Corporation, Mitsubishi Motors Corporation Code of Conduct	Social and Environmental Report 2008	<a href="http://www.mitsubishi-motors.com/corporate/environment/report/e/pdf/2008/2008e_all.pdf">http://www.mitsubishi-motors.com/corporate/environment/report/e/pdf/2008/2008e_all.pdf</a>

351	National Grid	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks	Whistleblowing, Giftmanagement, Disciplinary Action	Group Policy Statement	Group Policy Statement Anti-Fraud and Bribery Policy	<a href="http://www.nationalgrid.com/NR/rdonlyres/ECD76CC5-AA8D-454D-B87D-4160539D6A76/14775/CodeofEthics20091.pdf">http://www.nationalgrid.com/NR/rdonlyres/ECD76CC5-AA8D-454D-B87D-4160539D6A76/14775/CodeofEthics20091.pdf</a> <a href="http://www.nationalgrid.com/NR/rdonlyres/39B443D1-95E5-4000-82F0-88E5F45B78CE/14773/AntiFraudandBribery2009.pdf">http://www.nationalgrid.com/NR/rdonlyres/39B443D1-95E5-4000-82F0-88E5F45B78CE/14773/AntiFraudandBribery2009.pdf</a>	Countrywide Financial Corporation is a wholly owned subsidiary of Bank of America.
352	Countrywide Financial	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Ethics Oversight Committee	Code of Ethics	<a href="http://media.corporate-ir.net/media_files/irol/71/71595/corpgov/CodeofEthics12908.pdf">http://media.corporate-ir.net/media_files/irol/71/71595/corpgov/CodeofEthics12908.pdf</a>	
353	Tech Data	Yes		Anti-Corruption Policy, Prevention of Money Laundering	Giftmanagement, Whistleblowing	Code of Ethics, Director of Ethics and Compliance	Code of Ethics - International Business Code of Ethics - Conflict of Interest Code of Ethics - Employee Gifts, Entertainment and Sponsored Travel Policy Code of Ethics - Following the Code Code of Ethics - Ethics Reporting Hotline	<a href="http://www.techdata.com/content/td_ethics/internationalbusiness.aspx">http://www.techdata.com/content/td_ethics/internationalbusiness.aspx</a> <a href="http://www.techdata.com/content/td_ethics/conflictsofinterest.aspx">http://www.techdata.com/content/td_ethics/conflictsofinterest.aspx</a> <a href="http://www.techdata.com/content/td_ethics/businessgifts.aspx">http://www.techdata.com/content/td_ethics/businessgifts.aspx</a> <a href="http://www.techdata.com/content/td_ethics/followingthecode.aspx">http://www.techdata.com/content/td_ethics/followingthecode.aspx</a> <a href="http://www.techdata.com/content/td_ethics/hotline.aspx">http://www.techdata.com/content/td_ethics/hotline.aspx</a>	
354	Nordea Bank	Yes	GC	Anti-Corruption Policy, Prevention of Inappropriate Payments	Giftmanagement	Code of Conduct, Corporate Citizenship Principles	Code of Conduct Corporate Citizenship Principles	<a href="http://www.nordea.com/sitemod/upload/Root/www.nordea.com%20-%20uk/AboutNordea/Nordea_Code_of_Conduct.pdf">http://www.nordea.com/sitemod/upload/Root/www.nordea.com%20-%20uk/AboutNordea/Nordea_Code_of_Conduct.pdf</a> <a href="http://www.nordea.com/sitemod/upload/Root/www.nordea.com%20-%20uk/AboutNordea/Nordea_Corporate_Citizenship_Principles.pdf">http://www.nordea.com/sitemod/upload/Root/www.nordea.com%20-%20uk/AboutNordea/Nordea_Corporate_Citizenship_Principles.pdf</a>	
355	L'Oréal	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Facilitation Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Ethics, Director of Ethics	Sustainability Report 2007 Code of Ethics L'OREAL'S ETHICS PROGRAM	<a href="http://www.loreal.com/_en/_ww/pdf/LOREAL_RDD_2007.pdf">http://www.loreal.com/_en/_ww/pdf/LOREAL_RDD_2007.pdf</a> <a href="http://www.loreal.com/_en/_ww/html/company/pdf/code_of_ethics_uk.pdf">http://www.loreal.com/_en/_ww/html/company/pdf/code_of_ethics_uk.pdf</a> <a href="http://www.loreal.com/_en/_ww/html/our-company/l-oreal-s-ethics-program.aspx">http://www.loreal.com/_en/_ww/html/our-company/l-oreal-s-ethics-program.aspx</a>	
356	China Railway Construction	No							No information displayed on Homepage
357	Surgutneftegas	No							No information displayed on Homepage
358	Schlumberger	Yes		Anti-Corruption and Bribery Policy, Prevention of Improper Payments and Facilitation Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics	Code of Ethics	<a href="http://www.slb.com/media/about/slb_code_of_ethics.pdf">http://www.slb.com/media/about/slb_code_of_ethics.pdf</a> , <a href="http://www.ethics.slb.com/">http://www.ethics.slb.com/</a>	
359	McDonald's	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Kickbacks and Money Laundering and Improper Payments, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Standards of Business Conduct, Global Compliance Office	2008 CR Report Standards of Business Conduct	<a href="http://www.crmcdonalds.com/publish/csr/home/report/corporate_ethics.printreport.html">http://www.crmcdonalds.com/publish/csr/home/report/corporate_ethics.printreport.html</a> <a href="http://www.crmcdonalds.com/publish/etc/medialib/mcdonalds_media_library/report/downloads/standards_of_business_conduct.Par.0001.File.tmp/standards_of_business_conduct.pdf">http://www.crmcdonalds.com/publish/etc/medialib/mcdonalds_media_library/report/downloads/standards_of_business_conduct.Par.0001.File.tmp/standards_of_business_conduct.pdf</a>	
360	Publix Super Markets	No							No information displayed on Homepage
361	Norinchukin Bank	No							Website only available in Japanese language
362	Michelin	Yes		Anti-Corruption Policy	n/a	Performance and Responsibility Charter	Performance and Responsibility Charter	<a href="http://www.michelin.com/corporate/front/.DocumentRepositoryServlet?codeDocument=163&amp;codeRepository=MICHCORP&amp;codeRube=PRM">http://www.michelin.com/corporate/front/.DocumentRepositoryServlet?codeDocument=163&amp;codeRepository=MICHCORP&amp;codeRube=PRM</a>	
363	Asustek Computer	No							No information displayed on Homepage
364	Nationwide	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Kickbacks	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct & Business Practices, Office of Ethics	Code of Conduct & Business Practices	<a href="http://www.nationwide.com/pdf/ethicspropt.pdf">http://www.nationwide.com/pdf/ethicspropt.pdf</a>	
365	Edeka Zentrale	No							No information displayed on Homepage
366	AMR	Yes		Anti-Corruption and Bribery Policy, Prevention of Illegal Payments and Solicitations, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Business Ethics & Compliance Office, Chief Compliance Officer	Environmental Sustainability Report Code of Conduct	<a href="http://www.aa.com/content/images/amrcorp/amrerr.pdf">http://www.aa.com/content/images/amrcorp/amrerr.pdf</a> <a href="http://www.aa.com/content/amrcorp/corporateinformation/facts/ethics.jhtml">http://www.aa.com/content/amrcorp/corporateinformation/facts/ethics.jhtml</a>	
367	Toronto-Dominion Bank	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct and Ethics, Employee Ombudsman Office	Corporate Responsibility Report 2007 Code of Conduct and Ethics TDBFG Whistleblower Hotline	<a href="http://www.td.com/corporateresponsibility/crr2007/pdf/CRRReportFinalPrintOptEng.pdf">http://www.td.com/corporateresponsibility/crr2007/pdf/CRRReportFinalPrintOptEng.pdf</a> <a href="http://www.td.com/governance/code_ethics.pdf">http://www.td.com/governance/code_ethics.pdf</a> <a href="http://www.td.com/governance/whistleblower.jsp">http://www.td.com/governance/whistleblower.jsp</a>	
368	Evonik Industries	Yes		Anti-Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct for Employees, Compliance Officer	Code of Conduct for Employees	<a href="http://corporate.evonik.de/export/sites/default/binaries/downloads/en/code_of_conduct_en.pdf">http://corporate.evonik.de/export/sites/default/binaries/downloads/en/code_of_conduct_en.pdf</a>	
369	Continental	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct	Annual report 2007 Code of Conduct Bribery and corruption policy	<a href="http://www.conti-online.com/generator/www/com/en/continental/portal/themes/ir/financial_reports/01_reports/download/annual_report_2007_full_en.pdf">http://www.conti-online.com/generator/www/com/en/continental/portal/themes/ir/financial_reports/01_reports/download/annual_report_2007_full_en.pdf</a> <a href="http://www.conti-online.com/generator/www/com/en/continental/csr/themes/downloads/download/verhaltenskodex_en.pdf">http://www.conti-online.com/generator/www/com/en/continental/csr/themes/downloads/download/verhaltenskodex_en.pdf</a> <a href="http://www.conti-online.com/generator/www/com/en/continental/csr/themes/general_information/briberyandcorruption_en.html">http://www.conti-online.com/generator/www/com/en/continental/csr/themes/general_information/briberyandcorruption_en.html</a>	
370	MAN Group	Yes		Anti-Corruption and Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Compliance Officer and Compliance Board, Ombudsman	Annual Report 2007 Code of Conduct	<a href="http://www.man.eu/MAN-Downloadgalleries/EN/Investors_Relation/Annual_Reports/2007_gb/MAN_GB_gesamt_es.pdf">http://www.man.eu/MAN-Downloadgalleries/EN/Investors_Relation/Annual_Reports/2007_gb/MAN_GB_gesamt_es.pdf</a> <a href="http://www.man.eu/MAN-Downloadgalleries/EN/Company/Code_of_Conduct_english.pdf">http://www.man.eu/MAN-Downloadgalleries/EN/Company/Code_of_Conduct_english.pdf</a>	
371	Japan Tobacco	Yes		Employees Training	Giftmanagement, Whistleblowing	Guidelines for Conduct	CSR-Report 2008 Guidelines for Conduct	<a href="http://www.jti.co.jp/JTI_E/viron/assets2008/report2008.pdf">http://www.jti.co.jp/JTI_E/viron/assets2008/report2008.pdf</a> <a href="http://www.jti.co.jp/JTI_E/compliance/guidelines.html">http://www.jti.co.jp/JTI_E/compliance/guidelines.html</a>	
372	Nippon Yusen	Yes	GC	Employees Training	Whistleblowing	Chief Compliance Officer, Compliance Committee	CSR-Report 2008 Compliance Activities	<a href="http://www.nyk.com/english/profile/csr/pdf/2008.pdf">http://www.nyk.com/english/profile/csr/pdf/2008.pdf</a> <a href="http://www.nyk.com/english/profile/csr/compliance/index.htm">http://www.nyk.com/english/profile/csr/compliance/index.htm</a>	
373	Shanghai Automotive	No							No information displayed on Homepage
374	Northwestern Mutual	No							No information displayed on Homepage
375	Emerson Electric	Yes		Anti-Corruption Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Employee Handbook for the Emerson Business Ethics Program	Employee Handbook for the Emerson Business Ethics Program	<a href="http://media.corporate-ir.net/media_files/irol/10/107575/corpgov/EmployeeEthicsHandbook050916.pdf">http://media.corporate-ir.net/media_files/irol/10/107575/corpgov/EmployeeEthicsHandbook050916.pdf</a>	

376	Holcim	Yes	GC	Anti-Corruption and Bribery Policy	Giftmanagement, Disciplinary Action	Code of Conduct	Corporate Sustainable Development Report 2007 Code of Conduct	<a href="http://www.holcim.com/gc/CORP/uploads/Holcim_Corporate_SD_Report_2007.pdf">http://www.holcim.com/gc/CORP/uploads/Holcim_Corporate_SD_Report_2007.pdf</a> <a href="http://www.holcim.com/gc/CORP/uploads/Code%20of%20Conduct_08_englisch.pdf">http://www.holcim.com/gc/CORP/uploads/Code%20of%20Conduct_08_englisch.pdf</a>
377	Hochtief	Yes		Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Chief Compliance Officer, Corporate Compliance Counsel	Sustainability Report 2007 Code of Conduct Compliance Position Paper	<a href="http://www.hochtief.com/hochtief_en/data/pdf/sr07.pdf">http://www.hochtief.com/hochtief_en/data/pdf/sr07.pdf</a> <a href="http://www.hochtief.de/hochtief/data/pdf/ht_code_of_conduct_d.pdf">http://www.hochtief.de/hochtief/data/pdf/ht_code_of_conduct_d.pdf</a> <a href="http://www.hochtief.com/hochtief_en/data/pdf/compliance_e.pdf">http://www.hochtief.com/hochtief_en/data/pdf/compliance_e.pdf</a>
378	Hyundai Heavy Industries	No						No information displayed on Homepage
379	Raytheon	Yes		Anti-Corruption and Bribery Policy, Prevention of Kickbacks, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Corporate Ethics Office	Code of Conduct Ethics and Gift Giving	<a href="http://www.raytheon.com/ourcompany/stellent/groups/public/documents/legacy_site/cms01_023524.pdf">http://www.raytheon.com/ourcompany/stellent/groups/public/documents/legacy_site/cms01_023524.pdf</a>
380	State Bank of India	Yes		n/a	Giftmanagement, Whistleblowing	Code of Conduct	Annual Report 2007/08 - Corporate Governance Code of Conduct	<a href="http://crpd.sbi.co.in/uploads/forms/Corporate-Governance_20080610.pdf">http://crpd.sbi.co.in/uploads/forms/Corporate-Governance_20080610.pdf</a> <a href="http://www.statebankofindia.com/viewsection.jsp?lang=0&amp;id=0,170,530">http://www.statebankofindia.com/viewsection.jsp?lang=0&amp;id=0,170,530</a>
381	Wyeth	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Conduct, Ethics Office	Corporate Citizenship 2006 Code of Conduct	<a href="http://www.wyeth.com/irj/servlet/prt/portal/prtroot/com.sap.km.cms.wyeth_html/home/aboutwyeth/shared/Docs/2006_Corporate_Citizenship_Report.pdf">http://www.wyeth.com/irj/servlet/prt/portal/prtroot/com.sap.km.cms.wyeth_html/home/aboutwyeth/shared/Docs/2006_Corporate_Citizenship_Report.pdf</a> <a href="http://media.corporate-ir.net/media_files/IROL/78/78193/COC.pdf">http://media.corporate-ir.net/media_files/IROL/78/78193/COC.pdf</a>
382	International Paper	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Ethics, Director of Ethics and Business Practice	Code of Business Ethics	<a href="http://www.internationalpaper.com/PDF/PDFCompany/Faraci-2008_Code.pdf">http://www.internationalpaper.com/PDF/PDFCompany/Faraci-2008_Code.pdf</a>
383	Sumitomo Electric Industries	Yes		Anti-Bribery Policy, Prevention of Unlawful Payments, Employees Training	Giftmanagement, Whistleblowing	Sumitomo Electric Employee Compliance Manual, Compliance Committee	CSR Report 2008 Basic Concept of Compliance	<a href="http://www.sei.co.jp/csr_e/pdf/csr2008.pdf">http://www.sei.co.jp/csr_e/pdf/csr2008.pdf</a> <a href="http://www.sei.co.jp/csr_e/compliance.html">http://www.sei.co.jp/csr_e/compliance.html</a>
384	Electronic Data Systems	Yes		Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Improper Payments	Giftmanagement, Whistleblowing, Disciplinary Action	EDS Code of Business Conduct, Office of Ethics and Compliance	EDS Code of Business Conduct	<a href="http://www.eds.com/about/code/downloads/conduct.pdf">http://www.eds.com/about/code/downloads/conduct.pdf</a>
385	China State Construction	No						No information displayed on Homepage
386	Onex	Yes		Anti-Bribery Policy	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Business Conduct and Ethics	Code of Business Conduct and Ethics Whistleblowing policy	<a href="http://www.onex.com/Code_of_Business_Conduct_and_Ethics.aspx">http://www.onex.com/Code_of_Business_Conduct_and_Ethics.aspx</a> <a href="http://www.onex.com/Whistleblower_Policy.aspx">http://www.onex.com/Whistleblower_Policy.aspx</a>
387	KT	Yes	GC	Anti-Bribery Policy, Employees Training	Giftmanagement, Whistleblowing, Disciplinary Action	Code of Ethics, Code of Conduct, Ethical Management Office	KT 2007 Corporate Social Responsibility Report	<a href="http://event.kt.com/kthome/event/20070810/kt_2007csr_eng_low.dpf.pdf">http://event.kt.com/kthome/event/20070810/kt_2007csr_eng_low.dpf.pdf</a>
388	Tesoro	Yes		Anti-Bribery Policy, Prevention of Kickbacks and Pavoffs	Giftmanagement, Whistleblowing, Disciplinary Action	Tesoro's Code of Business Conduct, Business Conduct Office, Compliance Officer	Tesoro's Code of Business Conduct	<a href="http://www.tsocorp.com/stellent/groups/corpcomm/documents/tsocorp_documents/061357.pdf">http://www.tsocorp.com/stellent/groups/corpcomm/documents/tsocorp_documents/061357.pdf</a>
389	Cemex	Yes	GC	Anti-Bribery Policy, Prevention of Kickbacks, Employee Training	Giftmanagement, Whistleblowing, Disciplinary Action	Cemex Code of Ethics and Business Conduct, Ethics Committee	2006 Sustainable Development Report Cemex Code of Ethics and Business Conduct	<a href="http://www.cemex.com/sr2006/eng/pdf/CX06SR_English.pdf">http://www.cemex.com/sr2006/eng/pdf/CX06SR_English.pdf</a> , <a href="http://www.cemex.com/ic/pdf/Codigo_de_Etica_Ingles.pdf">http://www.cemex.com/ic/pdf/Codigo_de_Etica_Ingles.pdf</a>
390	Standard Chartered Bank	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Money Laundering and Financing Terrorism and Financial Crimes	Giftmanagement, Whistleblowing, Disciplinary Action	Code Of Conduct, Compliance and Assurance	Sustainability Review 2007 Code of Conduct Building a Sustainable Business	<a href="http://www.standardchartered.com/_documents/2007-sustainability-review/sc_2007_sustainabilityReview.pdf">http://www.standardchartered.com/_documents/2007-sustainability-review/sc_2007_sustainabilityReview.pdf</a> <a href="http://files.shareholder.com/downloads/STANCHAR/550580708x0x29458/C76F34A6-6B78-4144-A450-639CFEEB9CFC/Group%20Code%20of%20Conduct.pdf">http://files.shareholder.com/downloads/STANCHAR/550580708x0x29458/C76F34A6-6B78-4144-A450-639CFEEB9CFC/Group%20Code%20of%20Conduct.pdf</a> <a href="http://www.standardchartered.com/_documents/building-sustainable-business/sc_buildingSustainableBusiness.pdf">http://www.standardchartered.com/_documents/building-sustainable-business/sc_buildingSustainableBusiness.pdf</a>
391	Chubu Electric Power	Yes		Employees Training	Whistleblowing, Disciplinary Action	Compliance Committee	CSR Report 2008	<a href="http://www.chuden.co.jp/english/corporate/pdf/csrreport2008.pdf">http://www.chuden.co.jp/english/corporate/pdf/csrreport2008.pdf</a>
392	Accenture	Yes	GC	Anti-Corruption and Bribery Policy, Prevention of Improper or Illegitimate Transactions	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	Code of Conduct	<a href="http://www.accenture.com/NR/rdonlyres/7DA172D1-C101-4E14-92BD-AE9C6B520994/0/AccentureCodeofBusinessEthicsv4111.pdf">http://www.accenture.com/NR/rdonlyres/7DA172D1-C101-4E14-92BD-AE9C6B520994/0/AccentureCodeofBusinessEthicsv4111.pdf</a>
393	EnCana	Yes		Anti-Corruption and Bribery Policy, Prevention of Illicit Payments	Whistleblowing, Giftmanagement, Disciplinary Action	Business Conduct & Ethics Practice	Business Conduct & Ethics Practice Integrity Hotline - Integrity at EnCana Integrity Hotline - What to Report Integrity Hotline - How to Report Integrity Hotline - Investigating a Concern Acceptance of Gifts Guideline	<a href="http://www.encana.com/responsibility/policies/pdfs/p001778.pdf">http://www.encana.com/responsibility/policies/pdfs/p001778.pdf</a> <a href="http://www.encana.com/responsibility/policies/integrityhotline/index.htm">http://www.encana.com/responsibility/policies/integrityhotline/index.htm</a> <a href="http://www.encana.com/responsibility/policies/integrityhotline/whattoreport/">http://www.encana.com/responsibility/policies/integrityhotline/whattoreport/</a> <a href="http://www.encana.com/responsibility/policies/integrityhotline/howtoreport/">http://www.encana.com/responsibility/policies/integrityhotline/howtoreport/</a> <a href="http://www.encana.com/responsibility/policies/integrityhotline/investigating/">http://www.encana.com/responsibility/policies/integrityhotline/investigating/</a> <a href="http://www.encana.com/responsibility/policies/links/P1161191191894.html">http://www.encana.com/responsibility/policies/links/P1161191191894.html</a>
394	Arcandor	Yes	GC	Anti-Corruption Policy	Giftmanagement	Code of Conduct	United Nations Global Compact Communication on Progress 2007	<a href="http://www.arcandor.de/de/downloads/Arcandor_AG_UN_Global_COP_2007_english.pdf">http://www.arcandor.de/de/downloads/Arcandor_AG_UN_Global_COP_2007_english.pdf</a>
395	Formosa Petrochemical	No						No information displayed on Homepage
396	Vattenfall	Yes	GC	Anti-Corruption and Bribery Policy, Employees Training	Giftmanagement, Disciplinary Action	Code Of Conduct, Code of Conduct for Suppliers	CSR-Report 2007 Code of Conduct	<a href="http://report.vattenfall.com/Material/StaticPdf/VF+complete+CSR+Report+2007+++100+pages+++081008">http://report.vattenfall.com/Material/StaticPdf/VF+complete+CSR+Report+2007+++100+pages+++081008</a> <a href="http://www.vattenfall.com/www/vf_com/vf_com/Gemeinsame_Inhalte/DOCUMENT/360168vatt/392719work/P02.pdf">http://www.vattenfall.com/www/vf_com/vf_com/Gemeinsame_Inhalte/DOCUMENT/360168vatt/392719work/P02.pdf</a>
397	Otto Group	No						No information displayed on Homepage
398	COFCO	No						No information displayed on Homepage
399	Constellation Energy	Yes		Anti-Corruption and Bribery Policy, Prevention of Improper Personal Benefits, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Principles of Business Integrity, Corporate Compliance Program, Chief Compliance Officer, Compliance Committee	2008 Corporate Social Responsibility Report Principles of Business Integrity Corporate Compliance Program	<a href="http://www.constellation.com/vcmfiles/Constellation/Files/CEG_CSR07_Final_06_081230.pdf">http://www.constellation.com/vcmfiles/Constellation/Files/CEG_CSR07_Final_06_081230.pdf</a> <a href="http://files.shareholder.com/downloads/CEG/578775573x0x213074/f37dc2a5-8510-43cc-a380-bc2c3680f1e2/PBI_CEG.pdf">http://files.shareholder.com/downloads/CEG/578775573x0x213074/f37dc2a5-8510-43cc-a380-bc2c3680f1e2/PBI_CEG.pdf</a> <a href="http://files.shareholder.com/downloads/CEG/578775573x0x205148/187149dd-fb77-49ca-8c86-89083a28906e/corporatecompliance_102003.pdf">http://files.shareholder.com/downloads/CEG/578775573x0x205148/187149dd-fb77-49ca-8c86-89083a28906e/corporatecompliance_102003.pdf</a>
400	Canadian Imperial Bank of Commerce	Yes		Prevention of Money Laundering, Employees Training	Whistleblowing, Giftmanagement, Disciplinary Action	Code of Conduct	CIBC Annual Accountability Report Code of Conduct	<a href="http://www.cibc.com/ca/pdf/about/aar08-en.pdf">http://www.cibc.com/ca/pdf/about/aar08-en.pdf</a> <a href="http://www.cibc.com/ca/pdf/about/code-of-conduct-en.pdf">http://www.cibc.com/ca/pdf/about/code-of-conduct-en.pdf</a>