2012 Communication on Progress

Participant

- Grupo EULEN

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Time period

- January 2012 – December 2012

Files

- Informe de Responsabilidad Corporativa 2012.pdf (Spanish)

Format

- Part of a sustainability or corporate (social) responsibility report

Differentiation Level

- This COP qualifies for the Global Compact Advanced level

Self-assessment

- ✓ Includes an explicit statement of continued support for the UN Global Compact and its ten principles
- ✓ Description of actions or relevant policies related to Human Rights
- ✓ Description of actions or relevant policies related to Labour
- ✓ Description of actions or relevant policies related to Environment
- ✓ Description of actions or relevant policies related to Anti-Corruption
- ✓ Includes a measurement of outcomes
- ✓ Meets all criteria for the GC Advanced level

Verification
and Transparency

How is the accuracy and completeness of information in your COP assessed by a credible third-party?

- ✓ Information is assured by independent assurors (e.g., accounting or consulting firm) against recognized assurance standard (e.g., ISAE3000, AA1000AS, other national or industry-specific standard)

The COP describes any action(s) that the company plans to undertake to have the credibility of information in its COP externally assessed, including goals, timelines,

metrics, and responsible staff

Information is reviewed by multiple stakeholders (e.g., representatives of groups prioritized in stakeholder analysis)

Information is reviewed by a panel of peers (e.g., members of the same industry, competitors, benchmarked leaders, others organized via Global Compact Local Network)

Information is assured by independent assurors (e.g., accounting or consulting firm) using their own proprietary methodology

Other established or emerging best practices

The COP incorporates the following high standards of transparency and disclosure:

✓ Applies the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines

✓ Qualifies for Level B or higher of the GRI G3 or G3.1 application levels

✓ Provides information on the company's profile and context of operation

Strategy, Governance
and Engagement

Criterion 1: The COP describes mainstreaming into corporate functions and business units

✓ Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring that no function is conflicting with company sustainability commitments and objectives

✓ Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy

✓ Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary

Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts

Other established or emerging best practices

Criterion 2: The COP describes value chain implementation

✓ Communicate policies and expectations to suppliers and other relevant business partners

✓ Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence

✓ Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts

Other established or emerging best practices

Human Rights

Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights

✓ Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)

✓ Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)

✓ Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)

Other established or emerging best practices

Criterion 4: The COP describes effective management systems to integrate the human rights principles

✓ Process to ensure that internationally recognized human rights are respected

✓ Internal awareness-raising and training on human rights for management and employees

✓ Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 + ARE 4)

✓ Allocation of responsibilities and accountability for addressing human rights impacts

✓ Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)

Internal decision-making, budget and oversight for effective responses to human rights impacts

Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE3 + ARE 4)

Other established or emerging best practices

Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration

✓ Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue (BRE4 + ARE4)

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3)

Monitoring draws from internal and external feedback, including affected stakeholders

Leadership review of monitoring and improvement results

Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)

Outcomes of integration of the human rights principles

Other established or emerging best practices

Labour

Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour

✔ Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies

✔ Reflection on the relevance of the labour principles for the company

✔ Written company policy to obey national labour law, respect principles of relevant international labour standards in worldwide company operations and engage in dialogue with representative organization of the workers (international, sectoral, national).

✔ Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners

✔ Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation

✔ Participation and leadership by employers' organizations (international and national) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Structural engagement with a global union, possibly via a Global Framework Agreement

Other established or emerging best practices

Criterion 7: The COP describes effective management systems to integrate the labour principles

✔ Risk and impact assessments in the area of labour

✔ Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards

✔ Allocation of responsibilities and accountability within the organization

✔ Internal awareness-raising and training on the labour principles for management and employees

✔ Active engagement with suppliers to address labour-related challenges

✔ Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make

suggestions or seek advice, designed and operated in line with the representative organization of workers

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Other established or emerging best practices

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

✔ Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future

✔ Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards

✔ Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices

✔ Outcomes of integration of the Labour principles

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

System to track and measure performance based on standardized performance metrics

Other established or emerging best practices

Environment

Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship

✔ Written company policy on environmental stewardship

✔ Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners

✔ Specific commitments and goals for specified years

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development)

Reflection on the relevance of environmental stewardship for the company

Other established or emerging best practices

Criterion 10: The COP describes effective management systems to integrate the environmental principles

✔ Environmental risk and impact assessments

✔ Assessments of lifecycle impact of products, ensuring environmentally sound management policies

✔ Allocation of responsibilities and accountability within the organisation

✔ Internal awareness-raising and training on environmental stewardship for management and employees

✔ Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Other established or emerging best practices

Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

✔ System to track and measure performance based on standardized performance metrics

✔ Leadership review of monitoring and improvement results

✔ Process to deal with incidents

✔ Audits or other steps to monitor and improve the environmental performance of companies in the supply chain

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Outcomes of integration of the environmental principles

Other established or emerging best practices

Anti-Corruption

Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

✔ Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Publicly stated formal policy of zero-tolerance of corruption (D1)

Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)

Detailed policies for high-risk areas of corruption (D4)

Policy on anti-corruption regarding business partners (D5)

Other established or emerging best practices

Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle

✓ Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)

✓ Internal accounting and auditing procedures related to anticorruption (D10)

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Support by the organization's leadership for anti-corruption (B4)

Carrying out risk assessment of potential areas of corruption (D3)

Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)

Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)

Actions taken to encourage business partners to implement anti-corruption commitments (D6)

Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)

Other established or emerging best practices

Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

✓ Process to deal with incidents (D13)

✓ Outcomes of integration of the anti-corruption principle

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, metrics, and responsible staff

Leadership review of monitoring and improvement results (D12)

Public legal cases regarding corruption (D14)

Use of independent external assurance of anti-corruption programmes (D15)

Other established or emerging best practices

UN Goals and Issues

Criterion 15: The COP describes core business contributions to UN goals and issues

✓ Develop relevant products and services or design business models that contribute to UN goals/issues

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Align core business strategy with one or more relevant UN goals/issues

Adopt and modify operating procedures to maximize contribution to UN goals/issues

Other established or emerging best practices

Criterion 16: The COP describes strategic social investments and philanthropy

✓ Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy

✓ Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors

Other established or emerging best practices

Criterion 17: The COP describes advocacy and public policy engagement

✓ Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible

staff

Publicly advocate the importance of action in relation to one or more UN goals/issues

Other established or emerging best practices

Criterion 18: The COP describes partnerships and collective action

✓ Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain

Other established or emerging best practices

Governance

Criterion 19: The COP describes CEO commitment and leadership

✓ CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards

✓ CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact

Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team

Other established or emerging best practices

Criterion 20: The COP describes Board adoption and oversight

✓ Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance

✓ Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.

Other established or emerging best practices

Criterion 21: The COP describes stakeholder engagement

✓ Define sustainability strategies, goals and policies in consultation with key stakeholders

✓ Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance

✓ Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns

Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Publicly recognize responsibility for the company's impacts on internal and external stakeholders

Other established or emerging best practices

Note: Responsibility for the content of participants' public communication related to the Global Compact principles and their implementation lies with participants themselves and not with the UN Global Compact Office.