

ECTA

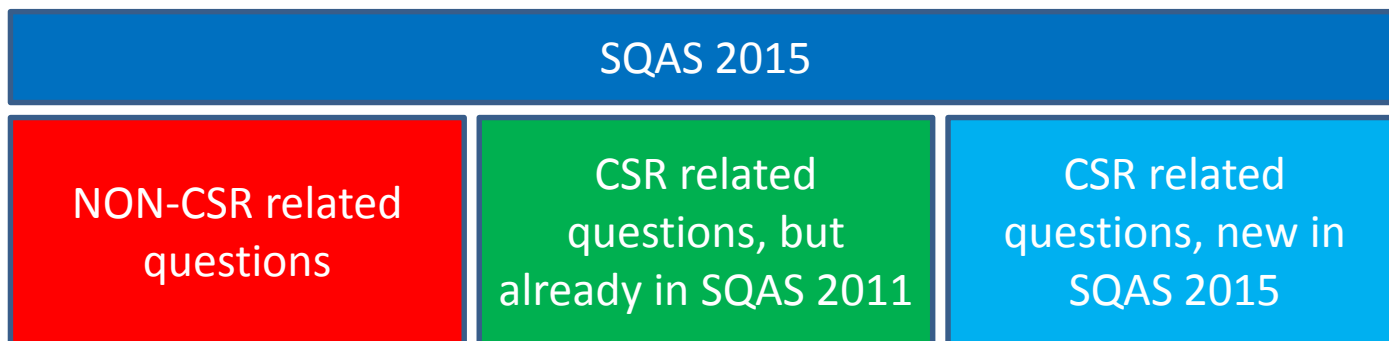


**CORPORATE SOCIAL
RESPONSIBILITY
BREAK-OUT SESSION**

ECTA Responsible Care Workshop
September 17th 2015

The revision approach visualized:

1. CSR Principles.
2. Translation into worldwide auditing system for chemical industries and their contractors.
3. European choice to stay with the SQAS approach.
4. Choice to do the overlap / gap analysis with existing SQAS modules as part of the SQAS 2014 revision process.
5. Publish the 2015 SQAS Modules
6. Link CSR to ECTA's Responsible Care program and establish the continuous improvement side of it for CSR aspects as well.



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September 2014

GENERIC POLICY - FOR USE, IF REQUIRED BY ECTA MEMBERS Corporate and Social Responsibility Policy

CSR is defined as the integration of business operations and values, whereby the interests of all stakeholders including investors, customers, employees, the community and the environment are reflected in the company's policies and actions.

Commitment and Aims

XXXXX are committed to:

- Continuous improvement in our Corporate and Social Responsibility (CSR) strategy by;
 - Encouraging our business partners to implement CSR ;
 - Continually improving our performance and meeting all applicable legislation;
 - Informing our staff to be mindful of the effect of their actions on non-renewable resources.
 - Introducing procedures to assist with implementing CSR. **Procedure required to cover below sections**
- The CSR policy is to make clear to all stakeholders what XXXXX mean by CSR and how XXXXX propose to work towards implementing and achieving CSR. The CSR policy applies throughout all activities of the company.
- XXXXX recognise that CSR embraces all aspects of sustainable development and social issues which are of most relevance to XXXXX and decide at what stage this CSR policy could most effectively and legally be included;
- XXXXX shall operate in a way that safeguards against unfair business practices;
- XXXXX believe that a responsible approach to developing relationships between companies and communities they serve, national and international, is a vital part of delivering business success;
- When carrying out our business, XXXXX will determine the environmental, social and economic issues;
- XXXXX will continually review all policies and business practices to encourage engagement with business partners and to promote development.

Corporate Governance

- XXXXX are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards;
- All the laws that regulate and apply will be complied with;
- XXXXX endeavour to ensure that stakeholders have confidence in the decision-making and management processes of the service provided, by the conduct and professionalism of all staff. XXXXX do this by continually training and developing our staff;
- All groups and individuals with whom XXXXX have a business relationship will be treated in a fair, open and respectful manner;
- Competition will be reasonable and based upon the quality, value and integrity of the services being supplied;
- Feedback on performance will be actively sought, and XXXXX will encourage customers to give feedback on our performance and ensure that all customer comments are analysed, responded to and where appropriate, acted upon;
- An Action Plan will be developed to ensure continuous improvement is achieved.

Environment

- XXXXX objective is to endeavour to reduce the impact on the environment through a commitment to continual improvement;
- XXXXX will continue to work with our partners to reduce their impact on the environment;
- XXXXX will by applying Responsible Care to all activities, assess the environmental impact and report against these findings and report openly to all stakeholders.

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Human Rights

- XXXX aim to support and respect the protection of internationally proclaimed human rights;
- All partners are actively encouraged to observe international human rights norms within their work.
- XXXX aim to eliminate discrimination based on any grounds (Race, Creed, Colour or Religion) and promote equality of opportunity in the transport logistics supply chain;

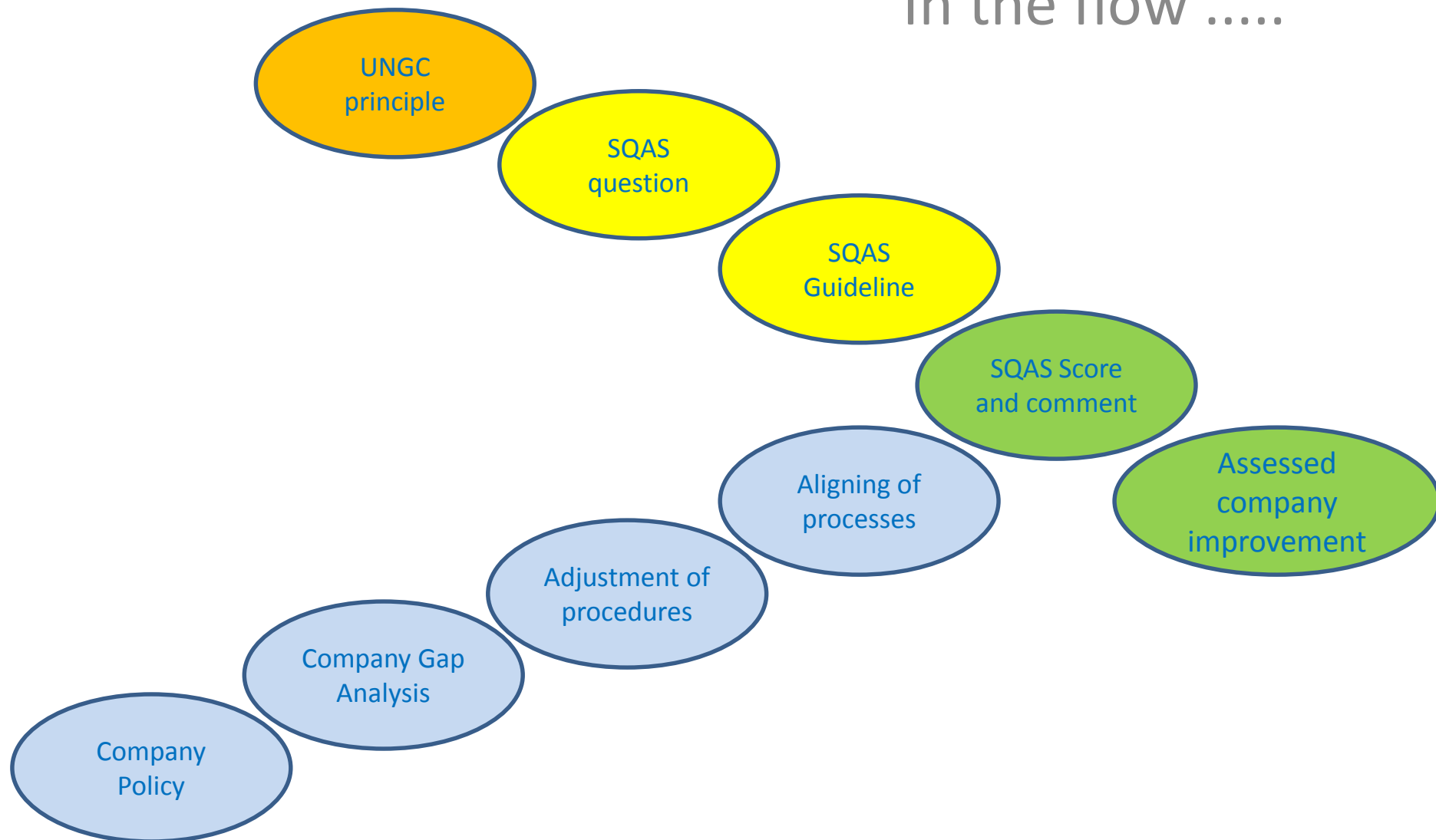
Sustainability

- A Sustainable Policy for Procurement of services will be maintained that will set out the principles, policies and procedures within Company.

Ethics and Ethical Trading

- XXXX will ensure clear visibility through the utilised supply chains to know where products are being moved from and to;
- Training will be provided to relevant people on environmental and social issues affecting the logistics supply chains;
- XXXX will ensure that partners uphold the workplace standards and behaviours consistent with the Company's requirements.
- A documented environmental and social assessment will be undertaken for every new contracted partner;
- XXXX are committed to ensuring that the welfare of workers and labour conditions within the logistics supply chain meet or exceed recognised standards;
- XXXX hold regular meetings with partners to support these ideas;

In the flow



Questions to be considered during implementation (abstract):

- What is already there (SHEQ-policies, contracts with employees etc.)?
- Next steps after a 'CSR-Policy / Code of Conduct' has been issued; just the policy might be not enough?
- Management Commitment; necessary changes?
- Person in charge?
- Procedure how to report a potential deviation?
- How to communicate / train?
- How to observe / monitor / spot-check?
- ...

Experiences / questions:

- *Points regulated by law (Europe) often not in separate policy because it is “clear”*
- *How far does it go, e.g. when buying clothes for employees from ... ? (Guidelines for Assessors Cefic -> Europe)*
- *Priority setting*
- *Position towards EcoVadis (ECTA / Cefic -> Agreement / position paper until end of the year 2015?)*
- *Arguments stronger when CSR (+ Code of Conduct) implementation has started*

Policy template from ECTA helpful?

- *Environmental part often already existing -> would be taken out by the individual company.*
- *Helps for 'gap analysis'*

Case:

Company A has had an SQAS Core & Transport Service assessment carried out on 29 November 2014, based on the (then) current questionnaire.

A customer of Company A asks for more details regarding the CSR implementation status. Company A has all 10 CSR Principles imbedded in its system.

Options available:

1. Tell the customer to wait till 29 November 2017.
2. Have a new full SQAS assessment carried out immediately.
3. Discuss with customer and agree on the use of a checklist of selected (SQAS 2015) CSR questions to be used to audit the company's system. Results to be presented as appendix to the company's current SQAS.

SQAS Core - Questionnaire & Guidelines - English version - 2015

10 UN principles

1.1.1.1	Does the company have a current written policy reflecting management's active commitment to:	
1.1.1.1.b	Corporate Social Responsibility (CSR) requirements?	all
1.1.2.1.	Is there an organisation chart and associated job description defining each individual's role within the organisation, including their responsibilities for SHEQ&Sec and CSR	all
1.1.3.1.	Is there proof available that the company stays abreast of all relevant legislation and legislative developments in the area of SHEQ&Sec and CSR and are persons formally designated or a source defined?	all
1.1.3.2.	Is there a procedure present which describes how legislative changes as detailed in the register of legal requirements are communicated and implemented in the company?	all
1.2.1.3.	Is there a written grievance and disciplinary procedure?	3,4,5,6
1.2.2.2.	Are the following subjects covered in the training programme :	
1.2.2.2.k	All aspects related to prevention of bribery and corruption?	10
1.2.2.2.m	Company ethics policy / code of ethics?	all
1.2.2.4.	Are records available to support the delivery of the training plan?	3,4,5,6
1.2.2.5	Are variances from the plan effectively followed up?	3,4,5,6
1.2.2.6	Is the effectiveness of the training checked for each employee ?	3,4,5,6

1.3.	SHEQ&Sec & CSR Performance Analysis	
1.3.1.1.	Is there a documented system in place for recording non-conformances regarding :	
1.3.1.1 h	corruption & bribery	10
1.3.1.1. i	grievance and disciplinary findings?	10
1.3.2.	SHEQ&Sec & CSR Objectives and Trend Analysis	
1.3.2.1.	Is there a process in place to monitor and analyze SHEQ&Sec & CSR data to identify trends and to set objectives and is there an action plan in place to achieve these objectives ?	all
1.4.1.1.	Is a formal management meeting held at least once a year to review the management system?. This includes the SHEQ&Sec and CSR requirements	all
1.4.1.2.	Does senior management monitor progress versus targets on SHEQ&Sec & CSR matters at relevant management meetings?	all
2.5.1	Are specific mechanisms in place to ensure effective implementation of your company's <u>Career Management and training policy</u> ?	3,4,5,6
2.5.2	Are specific mechanisms in place to ensure effective implementation of your company's <u>non discrimination policy</u>	1,2,6
2.6.1	Has the company formalized the fair business practices ?	all
2.6.2	Are there mechanisms in place to ensure effective implementation of the anti-corruption and bribery policy? (including for instance: conflict of interest, fraud, money laundering)	10
2.6.3	Are there mechanisms in place to ensure effective implementation of the anti-competitive practices policy?	10

3.1.1.	Is there a documented process defining and choosing the logistics solution and selecting the service partners for each business assigned to the company including a risk assessment covering SHEQ&Sec&CSR elements?	all
3.1.3.	Are annual SHEQ&Sec & CSR targets set for, and communicated to all involved service providers in the supply chain ?	all
3.1.4.	Does the company actively monitor the service providers actions to ensure achievement of all these targets ?	all
3.2.1.	Are contractors, working on site other than logistics service contractors, provided with relevant health, safety, security, environmental and CSR information to ensure that on site services are performed safely?	all