



Report on Northern Ireland Investment

[Prepared for the New York State Common Retirement Fund Pursuant to New York State Retirement and Social Security Law, § 423-a]

Thomas P. DiNapoli
New York State Comptroller
2010

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Emblem of the United Irishmen, 1794

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NEW YORK STATE'S NORTHERN IRELAND INVESTMENT LAW

§ 423-a. Northern Ireland related investments

1. Notwithstanding any other provision of law, on and after January first, nineteen hundred eighty-seven, any moneys or assets of the common retirement fund which shall remain or be invested in the stocks, securities or other obligations of any institution or company doing business in or with Northern Ireland or with agencies or instrumentalities thereof, shall be invested subject to the provisions of subdivision three of this section.

2. On or before the first day of January of each year, the comptroller shall determine the existence of affirmative action taken by institutions or companies doing business in Northern Ireland to eliminate ethnic or religious discrimination based on actions taken for:

(a) Increasing the representation of individuals from underrepresented religious groups in the work force including managerial, supervisory, administrative, clerical and technical jobs.

(b) Providing adequate security for the protection of minority employees both at the workplace and while traveling to and from work.

(c) The banning of provocative religious or political emblems from the workplace.

(d) Publicly advertising all job openings and making special recruitment efforts to attract applicants from underrepresented religious groups.

(e) Providing that layoff, recall, and termination procedures should not in practice favor particular religious groupings.

(f) The abolition of job reservations, apprenticeship restrictions, and differential employment criteria which discriminate on the basis of religion or ethnic origin.

(g) The development of training programs that will prepare substantial numbers of current minority employees for skilled jobs, including the expansion of existing programs and the creation of new programs to train, upgrade, and improve the skills of minority employees.

(h) The establishment of procedures to assess, identify,, and actively recruit minority employees with potential for further advancement.

(i) The appointment of senior management staff members to oversee affirmative action efforts and the setting up of timetables to carry out affirmative action principles.

3. Consistent with sound investment policy, the comptroller shall invest the assets of the common retirement fund in such a manner that the investments in institutions doing business in or with Northern Ireland shall reflect the advances made by such institutions in eliminating discrimination as established pursuant to subdivision two of this section.

(Added L.1986. c.h.112 § 2.)

INTRODUCTION

The MacBride Principles are a set of nine equal employment opportunity guidelines for firms operating in Northern Ireland promulgated in 1984 by the late Irish statesman and Nobel Peace laureate Sean MacBride and several associates. The Principles call on firms to increase employment opportunities for members of underrepresented religious groups, ban the display of provocative sectarian emblems in the workplace, promote security for minority employees and abolish hiring criteria that discriminate on the basis of religion or ethnicity. In 1986, the State of New York enacted the Northern Ireland Investment Law, Section 423-a of the Retirement and Social Security Law (Dearie-Flynn), which mandated that the State Comptroller make an annual determination concerning the advances made by U.S. companies in eliminating ethnic or religious discrimination in their Northern Ireland operations. This report has been prepared in fulfillment of that mandate.

EXECUTIVE SUMMARY / MAIN FINDINGS

- **U.S. companies in Northern Ireland employ approximately 27,000 employees** (6 per cent of the workforce in the private sector)—a number that has held steady despite the departure of several U.S. companies from Northern Ireland.
- **Catholic representation at U.S. companies has risen to 49 percent**, up from 2008's 46 percent and the 47 percent seen in several previous years.
- **The majority of U.S. companies have fair representation**, and the proportion of companies with U.S. parents that have underrepresentation continues to fall. However, despite the overall balance at U.S. companies more than one-quarter of the U.S. firms with more than 10 workers show an underrepresentation of Catholics or Protestants, as noted in Table 4. Only half of these firms are taking affirmative action outreach.
- **Location of investment is a sore point with equality advocates critical of government policy.** The bulk of new U.S. investments in Northern Ireland go to the Belfast area, which is the least deprived region. Some Catholic elected officials complain that the Government economic development agencies (which are under the jurisdiction of the Protestant-dominated Democratic Unionist Party [DUP] in the current power-sharing government), continue to steer outside investment toward Protestant areas, most especially those in and around Belfast. Equality activists point out that the wealthy areas around Belfast tend to be Protestant-dominated, making it more difficult for Catholics to achieve fair participation in the work force.
- **The effectiveness of the MacBride Principles campaign has been established by the success over the years of having 113 U.S. companies either reach agreements on the implementation of the MacBride Principles or meet the conditions of such agreements** (see Appendix C). Seventy-three of these firms currently have subsidiaries or affiliates in Northern Ireland.

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SHAREHOLDER RESOLUTIONS

The New York State Common Retirement Fund in 2009 continued to support shareholder resolutions asking portfolio companies to implement the MacBride Principles as a logical and further means of implementing the goals of Section 423-a of New York State's Retirement and Social Security Law (Ch. 112, Laws of 1986).

The effectiveness of shareholder resolutions on this issue has been established by the success over the years of having 113 U.S. companies either reach agreements on implementation of the MacBride Principles or meet the conditions of such agreements (see Appendix C). Seventy-three of these firms currently have subsidiaries or affiliates in Northern Ireland.

Proponents and management continued to negotiate through differences on fair employment policies and procedures in Northern Ireland in 2009, requesting through shareholder proposals to make all possible lawful efforts to implement and/or increase activity on each of the nine MacBride Principles. A significant number of the companies profiled in this report have agreed to take all lawful measures to implement the MacBride Principles.

THE PROGRAM

The Northern Ireland Service's Role

Since the 1986 enactment of Section 423-a, every effort has been made to ensure that both its letter and its spirit are fully implemented. Precautions have been taken to ensure that the information collection process avoided illegal or burdensome requests that would prevent or discourage company compliance. As would be expected, the process of gathering, reviewing, analyzing and reporting on these data is time consuming. With the expansion in the late 1980s of the number of U.S. companies subject to the review provided for in Section 423-a, the elements necessary to prepare an informative report multiplied.

At that point, the New York State Comptroller decided a third party independent monitor would provide the best understanding, discussion and resolution of issues relating to fair employment in Northern Ireland. In 1990 the Investor Responsibility Research Center (now part of RiskMetrics Group) took on that role administering a combined data collection process to avoid a duplication of efforts, and analyzing the data collected. The Northern Ireland Service of RiskMetrics maintains professionals who are trained in this unique area of research to enhance the quality of research. Data collection, review and analysis are conducted with consistency to serve the interested public better than the previously diverse processes undertaken. In addition, Northern Ireland Service staff conducts on site visits and interviews with management and employees at some Northern Ireland facilities that are significant employers in the province. These personal observations are invaluable in assessing the credibility and sincerity of corporate compliance and response.

The New York State Common Retirement Fund's substantial shareholdings in most of the companies profiled in this report help to persuade the surveyed firms to cooperate with the Northern Ireland Service's monitoring process. Appendix B shows the companies with operations in Northern Ireland that are in the Fund's portfolio.

Politics and the Equality Debate in Northern Ireland

Background to the Northern Ireland conflict: Northern Ireland, made up of six of the nine counties of the historic province of Ulster, was formed when Ireland was partitioned between the largely Catholic south and the largely Protestant northeast in 1921. Partition followed a protracted Irish struggle for home rule. Of Northern Ireland's current population of 1.69 million people, 40 percent identify themselves as Catholics, 46 percent as Protestants. The remaining 14 percent claim no religion.

Since 1969, conflict between the two communities has resulted in more than 3,000 deaths. The conflict is not mainly about religion; rather, it is a clash between the conflicting national identities of Irish-identified Catholic "nationalists" and British-identified Protestant "unionists." Harder-line supporters of a unified Irish republic are called "republicans," and militant advocates of protecting Ulster's place in the United Kingdom are called "loyalists."

The 1998 Good Friday Agreement established a government for Northern Ireland with an assembly of local politicians and an executive branch of ministers. A November 2003 election gave a majority of support in each community to the predominantly Protestant Democratic Unionist Party and predominantly Catholic Sinn Fein, eclipsing the more centrist Ulster Unionist and Social Democratic and Labour Parties. The DUP-Sinn Fein coalition government took several years to form, however, with the DUP wary of Sinn Fein even after the July 2005 renunciation of violence by the Irish Republican Army (IRA). In November 2006, DUP and Sinn Fein officials met with mediators in St. Andrews, Scotland, and agreed to establish a timeline for the resumption of a power-sharing government, which began governing in May 2007. However, normality is far from being restored in the more economically depressed suburbs. Here, unarmed and unidentified "squads" may ask for civilians' identification and in recent times racist violence and discrimination against immigrants arose in some Protestants quarters and workplaces, forcing especially some Polish and Romanian families to leave the country. Intimidating murals were painted even after the Good Friday Agreement and in the very center of Belfast at the entrance to some Protestant neighborhoods. By the Hotel Europa (Europe's most-bombed hotel during the Troubles), a mural welcomes visitors to Southern Belfast by saying "You are now in loyalist Sandy Row, heartland of Southern Belfast", with two red hands (a unionist symbol) formed in fists and a black-dressed paramilitary holding a gun and wearing a ski mask. After it was painted, a Union Jack was placed on top of it, and still stands.

Recent political developments: Since the beginning of the peace process, Sinn Fein and the DUP have seen their electoral support increase. A 2006 report published by the Institute of Governance showed how very few respondents identified themselves as both Irish and English. The 2007 Sinn Fein/Democratic Unionist Party government foundered somewhat in 2008, although at year's end the impasse was broken and the government accomplished significant legislation. In March 2008, a financial scandal forced Ian Paisley to resign as head of the DUP and from his position as first minister. Three months later, the ruling legislative body (known informally as Stormont because of its location) suspended operations in the midst of disputes regarding the timing of a planned transfer of some British governmental powers to local control. In late November 2008, the deadlock was at last broken, and the Stormont Assembly resumed operations. European elections were held in Northern Ireland on June 4, 2009, to elect three Members to the European Parliament (MEP). In this context, Northern Ireland is one electoral constituency and the MEPs would be elected by proportional representation. These elections represented the first test since the government was devolved back in May 2007, and acquired greater importance since one of the former MEPs, Jim Allister from the DUP, had opposed the power-sharing agreement between his party and the Sinn Fein and resigned from the DUP. Allister ran unsuccessfully for re-election as an independent and the split in Unionist ranks led to Sinn Fein's incumbent MEP, Bairbre DeBrun, emerging as the leading vote getter in the province, with the second European seat being taken by the Ulster Unionist party. In other indications of increased political stability, an agreement among the leading Northern Ireland political parties was reached in February 2010 to have powers for policing and justice transferred from the British government to the Northern Ireland Assembly on April 12, 2010. Also, in the May 2010 UK parliamentary elections Northern Ireland political parties supporting the province's power sharing government were returned to office, while the government's opponents did not fare well.

Relevance of MacBride campaign in Northern Ireland today: Recent figures show the religious composition of the overall work force roughly matches the figures of the available work force, suggesting through the improved employment picture for Catholics that U.S. pressure on companies has paid off. The days of Catholics avoiding the Protestant-dominated shipyards have long since passed. A bar nicknamed "The Suicide" because its patrons sat between two hard-line neighborhoods is now a local tourist attraction. It is often said that the Principles have gone a long way towards achieving the aims of the original signatories. Advocacy of the MacBride Principles mimics the work of Northern Ireland's Equality Commission in most respects, but equality advocates credit continued U.S. pressure with prompting action on issues that might otherwise be pushed aside.

Most employers in Northern Ireland today consider promoting equality to be second nature to their business. It is rare to interview a company representative in Northern Ireland who is not well versed in equality schemes. The change in attitude has been accompanied with real results. The most recent figures indicate that Catholics make up 42.3 percent of the work force in Northern Ireland, a figure almost mirroring the 42.7 share of the Catholic population available for work. Citing these findings, the Equality

Commission commented, "This means that the imbalance between Protestant and Roman Catholic participation in the overall workforce, which was evident in the early nineties, has largely disappeared."

The private sector work force of Northern Ireland is more equitable than in years past, but individual problems remain. A low annual turnover rate can delay the ability of management to conduct affirmative action, but even low annual rates potentially can yield big results over several years. The gap in unemployment figures between Protestants and Catholics also continues to be a problem. The head civil service department, the Office of the First Minister and Deputy First Minister, solicited a report by a consulting agency that was released in November 2005. The Report on Labor Market Dynamics revealed "evidence of continuing inequality in the two communities' labor market outcomes. Catholics have continued to experience persistently higher rates of unemployment compared to Protestants, to experience higher rates of economic inactivity, particularly those inactive but wanting work."

Voluntary segregation between Protestants and Catholics also continues. "Peace" walls separate hard-line neighborhoods into community enclaves, and the vast majority of Catholic students attend Catholic schools, while Protestants attend public ones. As a recent article in *The Economist* noted, "The war is over in Northern Ireland, but normality is proving elusive." Most companies require employees to check their sectarianism at the door, but community affiliation still plays a role in business.

Asked whether the MacBride Principles are still relevant today, Tim Cunningham, of the independent Belfast human rights group Committee on the Administration of Justice (CAJ), said in 2008, "the monitoring figures clearly show there is still a long way to go, and no room for complacency. However, there is clearly no desire among policy-makers or politicians to highlight these ongoing problems - hence it is vital that outside organizations and international pressure continues in the form of MacBride."

With the political future of Northern Ireland unresolved, the MacBride Principles will likely play a role in the economy for many years to come. Speaking at a CAJ conference, New York City Comptroller William Thompson said in 2006, "The MacBride principles played a key role in the fight to develop fair employment legislation in Northern Ireland. While we still have a long way to go, we can say that today, through all of our efforts, the workplace is the most integrated sector of society in Northern Ireland."

Investment and equality concerns: While the long-awaited peace dividend has borne some fruit in terms of new investment projects in Northern Ireland, the global economic downturn of 2008-2009 has hurt business and increased tensions between the Protestant and Roman Catholic communities, as seen both in an increase in violence and increased legal accusations of employment discrimination (see "Formal Discrimination Complaints" below). Even before the economic downturn, much of the investment bypassed the region's most deprived communities, whose plight is compounded further by the fact that many of their job-seekers are ex-prisoners who were convicted of violent offences during the 30-year civil conflict. Northern Ireland law generally allows employers to discriminate against such individuals in hiring decisions. Both problems are largely beyond the influence of the MacBride Principles, which have focused on affirmative action responsibilities at private sector employers.

Statutory Monitoring and Fair Employment Law in Northern Ireland

The Fair Employment and Treatment (Northern Ireland) Order of 1998, an act of the British Parliament, requires all public and private sector employers with more than 10 full- and part-time employees to register with the Equality Commission, and to submit annual reports to the commission showing the religious composition of the workforce. The 1998 law consolidated all previous legislation relating to religious and/or political discrimination in Northern Ireland, including the Fair Employment (Northern Ireland) Act of 1989; the order also added legal requirements for employers and government bodies. In addition, the law mandates periodic reviews of employment practices and monitoring of job applications by employers with more than 250 workers. The law also gives the Equality Commission, which replaced the Fair Employment Commission, the power to investigate employers and issue binding directives to ensure compliance. The commission has investigated some large companies with small proportions of Catholics or Protestants, negotiating affirmative action agreements upon the completion of its investigations, but it has chosen not to use its power to issue directives. The members of the Equality Commission are still appointed by the British Secretary of State for Northern Ireland and some equality advocates have alleged that their decisions can sometimes be influenced by outside political pressure. A widely publicized case in point involved a pro-republican newspaper, "Daily Ireland" that the Commission

initially concluded in 2005 had been unlawfully denied government assistance due to its political stance. Following a Unionist protest in the British House of Lords, the Commission dropped the case. Deprived of government financial support available to its rivals, "Daily Ireland" was subsequently forced to cease publication in 2006.

Catholic representation overall at employers monitored by the Equality Commission grew again in 2007 (the latest year for which data are available) to 44.6 percent, its highest proportion since monitoring began and part of a continuous upward trend. Historically, Catholics have been better represented in the public sector than the private, but in 2007 the gap between Catholic representation in those sectors disappeared entirely. The Commission reported that somewhere between 40.4 and 44.0 percent of working-age people in Northern Ireland are Roman Catholic.

The monitored work force, including both the public and private sector, now stands at 526,211. The service sector continued its growth, surpassing 65 percent of the private sector's full-time workforce. Manufacturing jobs, which have been in decline for the better part of a decade, saw a slight increase in 2007, while construction jobs increased by 5.1 percent.

Key Fair Employment Indicators

Three key indicators provide a good sense of the fair employment record of U.S. firms as a whole in Northern Ireland:

- affirmative action efforts taken because Catholics or Protestants are underrepresented in a workforce,
- the impact these efforts have had in moving towards fair representation where it is lacking, and
- the number of discrimination complaints filed and the number of lost or settled claims.

This section looks at each indicator in turn. It shows that most U.S. firms with low proportions of Catholic or Protestant employees are making affirmative action efforts. Further, companies with Catholic underrepresentation seem to have made more progress towards achieving fair representation than companies with Protestant underrepresentation. Finally, the number of new discrimination complaints filed against U.S. firms fell sharply in the last year, putting to rest concerns that had been raised by a previous trend for growth in this area.

Affirmative action: Throughout the past years, the operations of at least 18 U.S. companies have developed affirmative action plans with the assistance of the Equality Commission: 3M, AES, Baker Hughes, BE Aerospace, Bemis, Blockbuster, Caterpillar, Chesapeake, Crane, several General Electric affiliates, H.I.G. Capital Management, Interface, Nacco Industries, Openwave Systems, OSI Industries, TeleTech Holdings, Terex and three United Technologies operations.

U.S. employers that are undertaking affirmative action outreach steps are using a number of methods to encourage more applications from the community underrepresented at their operations. Developing links with particular schools is still the most common effort, but other forms of community outreach—such as meeting with local Protestant or Catholic community or church leaders—still come in a close second. A handful of companies are using ads recommended by the Equality Commission that specifically encourage one or the other group to apply. Other efforts that companies have reported over the years include busing employees from specific areas, sponsoring Gaelic Athletic Association teams as part of outreach to Catholics, and at one large firm, establishing a full-time community liaison position. Participation in training programs targeted to a particular community remains a rarity.

What may be having an even more widespread effect than affirmative action outreach efforts at a few firms are the systematic recruitment and hiring practices now in place at a broad array of companies. Sustained attention from top management appears to be a key factor in ensuring that affirmative action programs produce results. Some firms continue to have difficulty correcting an imbalance in the workforce, despite having comprehensive policies.

Location—Location of investment has been a sore point with equality advocates critical of government policy. The bulk of new U.S. investments in Northern Ireland go to the Belfast area, which is the least deprived region. Some Catholic elected officials have complained that Government economic development agencies (which are under the jurisdiction of the Protestant-dominated Democratic Unionist Party [DUP] in

the current power-sharing government) continue to steer outside investment towards Protestant areas, most especially those in the greater Belfast area. Equality activists point out that wealthy areas around Belfast tend to be Protestant-dominated areas, making it more difficult for Catholics to achieve fair participation in the work force. However, some U.S. firms have thrived in disadvantaged areas. One good example of a firm bucking traditional choices is Allstate, whose subsidiary Northbrook Technology has opened offices in two neglected areas, Strabane and Derry City. Likewise, TeleTech has stuck with a difficult location in North Belfast that has seen substantial sectarian tension.

Representation trends: Although it may be difficult to correct an imbalance in the workforce composition quickly, small efforts on a regular basis should yield positive results several years later. An examination of employment trends shows some companies have made more progress than others. The number of employees hired annually helps determine the effectiveness of affirmative action measures.

The long-term trend that has seen little change toward fairer participation at firms with a low number of Protestants continues. Firms that have had an underrepresentation of Catholics seem to have been more successful at correcting this imbalance, although this is not true in all cases. This apparent trend toward more positive movement for companies with Catholic underrepresentation, and a corresponding lack of movement for firms with Protestant representation, has been evident in the Northern Ireland Service's small sample for the last seven years. These trends must be treated with caution given the small sample size, but they have been consistent over time, giving them credence.

Formal discrimination complaints: A Fair Employment Tribunal (FET) to settle disputes between individuals and employers has been in place since 1990. After a complaint is filed, the FET first sends parties to the separate Labour Relations Agency for conciliation; they return to the FET if those mediation efforts fail.

In recent years, the number of cases filed at the FET has declined precipitously—only to rise again as the recession hit. As recently as the early 2000s, over 450 cases were filed each year, with 465 cases filed in 2004. Since then, however, the decline in the number of cases filed has been dramatic: 214 cases in 2005, 146 cases in 2006, and 161 in 2007. The Northern Ireland Service's December 2009 visit to the Fair Employment Tribunal in Belfast allowed an analysis of claims filed through August 2009 (due to a 16-week deposit time at the FET between the claim filing and its availability to the public). These data show an increase in FET claims after a multi-year decline. Nearly as many claims were filed through August 2009 (193) as in the entirety of 2008 (196). Viewing only the January-August period in the two years, claims increased by 35 percent.

Claims against private employers also increased in 2009 compared with 2008. Looking again at the January-August period of each year, in 2009 45 percent of claims were against private employers, as opposed to 40 percent in 2008. Most of these 2009 claims are still pending; one was conciliated, one settled and four withdrawn.

Complaints against companies and evolution through years in the Northern Ireland Service:

The tribunal has issued findings of discrimination for under 2 percent of all the cases it has resolved since 1990. The parties have settled the complaints in roughly 20 percent of the cases—sometimes for sums seen as substantial in Northern Ireland, although awards do not approach those in the United States; the highest awards made public so far have been a little more than \$100,000, and most are for much less. Complainants have withdrawn about 60 percent of the cases (once they receive more information about the circumstances of their cases, they often discover there is no fair employment angle). The tribunal has dismissed a little more than 10 percent of the cases, generally after hearings, and stayed less than 1 percent. The Labour Relations Agency has conciliated more than 8 percent of the cases.

It remains the case that the FET has formally determined that only three companies—BE Aerospace, Visteon (spun off from Ford Motor in 2000), and an affiliate of General Electric—have violated the law, but 15 companies have settled a total of 27 claims since 1994 (against 13 companies and 22 settlements in 2008, for a 22-percent increase). Companies often do not admit blame in the settlement process and sometimes argue that settling is a more financially attractive approach. Companies with current operations in Northern Ireland that have settled claims are listed in Table 1.

Companies do not always report on complaints in their responses to an annual survey by the Northern Ireland Service. In some cases respondents inaccurately indicate no claims have been filed. In some instances, however, companies report on internal complaints that never make it to the tribunal process, while others provide descriptions of the cases. The FET records the resolution of claims in hand written notes next to listed claims in the FET Register, which made necessary the visit by Northern Ireland Service staff to the FET in Belfast, in early December 2009. A list of the claims filed against U.S. companies with current operations in Northern Ireland since 2004 is in Table 2.

<i>Companies</i>	<i>Number</i>
Abbott Laboratories	1
AVX	2
Bain Capital	1
BE Aerospace	2
Bittware	1
Blackstone Group	1
Carlson Cos. Inc.	1
Coca-Cola Hellenic Bottling Co.	4
Domino's Pizza	1
General Electric	4
McDonald's	1
Nacco Industries	3
OSI Industries	3
Texas Pacific Group	2
<i>Total</i>	<i>27</i>

<i>Company</i>	<i>Number of Cases By Disposition</i>						<i>Total claims at company</i>
	<i>Pending</i>	<i>Guilty</i>	<i>Settled</i>	<i>Withdrawn</i>	<i>Dismissed</i>	<i>Conciliated</i>	
Abbott Laboratories			1				1
Bain Capital			1				1
Baker Hughes	1						1
Bemis						5	5
Bittware Inc.	1						1
Carlson Cos. Inc.			1				1
Caterpillar				1	4	1	6
Citigroup	1						1

<i>Company</i>	<i>Number of Cases By Disposition</i>						<i>Total claims at company</i>
	<i>Pending</i>	<i>Guilty</i>	<i>Settled</i>	<i>Withdrawn</i>	<i>Dismissed</i>	<i>Conciliated</i>	
Coca-Cola Hellenic Bottling				2			2
Deloitte Touche Tohmatsu				4			4
Domino's Pizza Inc.			1				1
Gap					1		1
General Electric	2						2
Madison Dearborn Partners						2	2
Manpower Inc.						1	1
McDonald's			1		1		2
Nacco Industries	4			3	1		8
OSI Industries			1				1
Pfizer					1		1
PriceWaterhouseCoopers				1			1
Sanmina-SCI						1	1
TeleTech Holdings						1	1
Terex	1						1
Visteon				3		2	5
Yum Brands	1						1
Total claims at all companies	11	0	6	14	8	13	52

THE SURVEYS

To determine whether—and to what extent—advances are being made in the elimination of religious discrimination, the Northern Ireland Service sent its Survey on Operations in Northern Ireland to corporate officials of U.S. companies with operations in Northern Ireland starting in October 2009. The Northern Ireland Service sends the survey to all U.S. companies known to have operations in Northern Ireland as well as to those that press and other reports indicate may be there.

The Northern Ireland Service has designed different surveys to reflect the varying number of employees U.S. companies have in Northern Ireland. The companies with more than 100 employees were asked to complete the most detailed questionnaire. Companies with between 11 and 100 employees received a somewhat shorter survey and the firms with 10 or fewer employees received a brief questionnaire, as did firms with franchise ties. Some companies received multiple or customized surveys because they have more than one subsidiary or their subsidiaries have more than one location. A few companies received only letters of inquiry because it was unclear if they had any operations at all in Northern Ireland.

Questions on religious composition tend to yield little valuable information on the smallest employers because the numbers are too small to be meaningful. Provisions of Northern Ireland's fair employment law

adopted in 2000 require all employers to report to the Equality Commission monitoring data on their applicants and new hires.

In addition to asking companies about the religious composition of their workforce, applicants, new hires and redundancies (layoffs in Northern Ireland parlance), the survey requests information on demographics, in addition to a range of questions on fair employment policies and practices. Past respondents can incorporate by reference answers to previous questionnaires that remain current and complete.

Since 2001, the Northern Ireland Service has provided on its survey an option for companies to indicate if their operations "currently reflect the fair employment standards embodied in the MacBride Principles," or will at a specified date in the near future, and whether the company is willing to cooperate with the annual Northern Ireland Service monitoring. This provides an avenue to an accord on implementation of the principles that previously generally had been available only to companies that have received shareholder resolutions on the subject, excluding both firms whose stock was not held by MacBride activists and companies that were privately held.

RESPONSE OF COMPANIES TO THE SURVEY

The response rate to the survey decreased in 2009, partly due to conditions external to the recipients (the economic downturn causing several facilities to close down), and partly due to internal reasons (the limited amount of internal resources available made companies concentrate their efforts on regulatory requirements, and consequently surveys such as this appeared less appealing). While fewer than 50 percent of U.S. companies submitted information in 2007, and nearly 55 percent gave a full or partial response in 2008, only 34 percent of US companies responded in 2009. Nearly half of non-responding companies are privately held and therefore have a lessened incentive to participate. Besides the reasons mentioned above, companies may not be responsive because of the newness of their operations, the lack of shareholder pressure on the issue if they are privately held, a corporate culture that is not disposed toward disclosure, the relatively small size of the parent company, or the lack of a team dedicated to Northern Ireland. Smaller, less widely held companies generally have provided less information over the years, although there are notable exceptions. These firms also have been many of the recent entrants to Northern Ireland, particularly in the high-tech sector.

Non-respondents of particular note are firms that in earlier years have agreed to implement the MacBride principles and cooperate with annual monitoring of their operations. If such companies return no response in three consecutive years, their MacBride compliant status is in jeopardy.

As in previous years, some companies were much more responsive than others. A partial response most typically included policy information but omitted data on workforce composition. For the smallest companies, there can be particularly good reason to withhold such information. Since it can be illegal in Northern Ireland to identify an individual's religion, a company with only one manager, for example, may be reluctant to report that person's community affiliation. Some companies provided minimal responses, such as confirming that the information the Northern Ireland Service has on file is correct or providing minor details regarding their operations in Northern Ireland.

Companies that did not provide any information are among the group identified as non-respondents.

A summary of 2009 company responses for firms with current operations in Northern Ireland appears below.

Full Response to Survey (22)

AES	Caterpillar	Omnicom Group
Allstate	CBS	OSI Industries
Anixter International	Coca-Cola Co.	TJX
Aon Corp	Crawford & Co.	United Parcel Service
Art Technology Group	Disney (Walt)	Wal-Mart Stores Inc.
AVX	DuPont (E.I.) de Nemours	Wombat Financial Services
Bittware Inc.	Gap	
Black Box Corp.	Johnson & Johnson	

Partial or Minimal Response to Survey

Allen Systems Group
Goodyear Tire & Rubber

McDonald's

No Response to Survey

3M
Abbott Laboratories
Ace Hardware
Aecom Technology Corporation
American International Group
Ametek
Apollo Management LP
Art Technology Group
Avon Products
Bain Capital
Baker Hughes
BE Aerospace (UK)
Bemis
Black & Decker
Borland Software
Broadsoft
Carlson Cos. Inc.
Chevron
Citigroup
Clear Channel Outdoor Holdings
Columbus McKinnon Corp.
Computer Sciences
ConocoPhillips
Crane
Danaher
Doctors' Associates Inc.
Domino's Pizza Inc.

DTS Inc.
Dun & Bradstreet
Emerson Electric
Expeditors International of
Washington Inc.
F5 Networks Inc.
General Electric
Goodrich
Grant Thornton LLP
Hallmark Cards
HeartSine Technologies
Hewlett-Packard
Honeywell International
Hyatt Hotels Corp.
IAC/Interactive
Illinois Tool Works
Interface
International Business Machines
Interpublic Group
Kellogg
Kiel Laboratories
Koch Industries
Kraft Foods Inc.
Lauder (Estee)
Liberty Mutual Insurance
Lilly (Eli)
Lockton Inc.

Mars
Marsh & McLennan
Merck
Microsoft
MiMIX Broadband
Nacco Industries
NCR
Office Depot
Openwave Systems
PepsiCo
Pitney Bowes
PPG Industries
Procter & Gamble
PubliCARD
Raytheon
Schein (Henry) Inc.
Seagate Technology
Signet Armormite
Starbucks Corp.
Tech International
Terex
Texas Pacific Group
Virgin Media
Visteon
Watson Pharmaceuticals
Welch Allyn
Xerox

Employment Trends

U.S. firms now employ at least 27,000 workers in Northern Ireland, holding steady from 2008 despite the recession and up from under 25,000 in the past several years. Employment has grown more than two and one-half times since the first paramilitary ceasefires in 1994. Employment growth has appeared to take little notice of the uncertainties in the Northern Ireland political process, but has reflected macro economic trends in the industrialized world, with an increase in service sector jobs,

including the tech sector, and a reduction in manufacturing. Employment at manufacturing-based operations has fallen in the last several years as jobs move to regions with lower pay scales.

Compliance with Affirmative Action Thrust of MacBride

Most of the U.S. companies appear to follow policies and practices generally consistent with the MacBride principles. Affirmative action outreach steps are also not warranted at companies where there is no underrepresentation of either community. However, despite the overall balance at U.S. companies, more than one quarter of the U.S. firms with more than 10 workers show an underrepresentation of Catholics or Protestants, as noted in Table 4. Only half of these firms are taking affirmative action.

Since 1991, as the younger and more heavily Catholic cohort of workers has begun looking for work, the religious composition of the economically active population has shifted, as noted above. The 2001 census established that the working age population of Northern Ireland is 42.7 percent Catholic. The Northern Ireland Service has continued to be relatively conservative in conclusions about fair participation and consequent affirmative action obligations because of the many factors involved in making accurate assessments of this nature.

Table 3			
New York State Common Retirement Fund Portfolio - U.S. Corporations Doing Business in Northern Ireland With Underrepresentation			
<i>Parent Company</i>	<i>Northern Ireland Operation</i>	<i>Underrepresented Community</i>	<i>Affirmative Action</i>
3M	3M Industrial Tapes	Catholic	Yes
AES	AES Kilroot Power	Catholic	Yes
Allstate	Northbrook Technology of NI Ltd.	Protestant	No
Aon Corp	Aon Risks Services (NI) Ltd	Catholic	No
AVX	AVX Ltd.	Catholic	No
Baker Hughes	Hughes Christensen	Catholic	Yes
Bemis	Perfecseal Ltd.	Protestant	Yes
Blackstone Group	Hilton Belfast	Protestant	No
Blackstone Group	Hilton Group PLC t/a Hilton Templepatrick	Catholic	No
Caterpillar	Wilson F.G. (Engineering)	Catholic	Yes
Chesapeake	Field Boxmore Belfast Ltd	Catholic	Yes
Computer Sciences	CSC Computer Sciences	Protestant	No
Crane	Stockham Valve Ltd.	Catholic	Yes
Emerson Electric	Copeland Ltd.	Protestant	No
General Electric	Hurst (Charles)	Catholic	Yes
Interface	Interface Europe	Protestant	Yes
Lauder (Estee)	Estee Lauder Cosmetics Ltd.	Protestant	NA
Manpower Inc.	Manpower PLC	Protestant	Unknown
Openwave Systems	Openwave	Protestant	Yes
TeleTech Holdings	TeleTech Holdings	Protestant	Yes
Terex	Powerscreen International Distributors Ltd.	Protestant	Yes
United Technologies	Chubb (NI) Ltd.	Catholic	Yes

NOTES ON COMPANY PROFILES

Both survey respondents and companies that did not answer the Northern Ireland Service questionnaire are profiled in the main body of the report. Each profile indicates the source of information used. The profiles of non-responsive companies are based on available data. Statistics from the Equality Commission on firms with more than 25 employees are an important but limited source in cases where companies have not provided information. The commission provides religious composition information only for each overall work force, while Northern Ireland Service sought numbers broken down by job category for significant employers, and in some instances data for multiple locations. To protect individual privacy, the Equality Commission has not released complete composition information on an employer if there are fewer than 10 people from one community at the company. In these cases, it has provided the overall employee numbers and indicated there are fewer than 10 Catholics or Protestants. For larger employers, that is sufficient information to establish whether there appears to be an underrepresentation of one group. But for smaller employers, particularly those with fewer than 30 workers, the overall data are not of great assistance. Aside from the commission, the Fair Employment Tribunal maintains a register of cases that is an important source of information about complaints that

have been filed. As noted above, even companies that respond to the survey have not always reported on grievances filed against them.

Small Employers

The Northern Ireland Service uses the threshold of 10 workers as a reasonable cut-off for the kind of reporting required by section 423-a of the Retirement and Social Security Law (Ch. 112, Laws of 1986). But because that statute does not refer to a *de minimus* standard, to the extent that the Northern Ireland Service is aware of the firms with very small operations in Northern Ireland, it has provided information in this report.

Thus, some of the companies described here are regionally very small employers. The Northern Ireland Service generally has not examined such companies in detail because it is very difficult to say much that is meaningful about their workforce composition. The main provisions of Northern Ireland's fair employment law apply only to companies with more than 10 employees. This is widely regarded as a low threshold for such laws.

The Northern Ireland Service has another concern about very small employers—ensuring the list is comprehensive. Many firms that market overseas maintain a handful of sales and/or service employees in an area such as Northern Ireland. It is very likely there are U.S. firms with one or a few employees in Northern Ireland that have not yet been identified by the Northern Ireland Service. The problem of identifying such firms is particularly difficult given that Northern Ireland is part of a larger entity—the United Kingdom—in which many U.S. firms are active. On the other hand, annual monitoring of these firms can identify companies that move above the 10 worker threshold which otherwise might be missed.

Catchment Area Issues

Summary information on the religious composition of workforces is provided and each profile makes an assessment of whether Catholics or Protestants are significantly underrepresented, where possible. The assessment is based on a statistical comparison of the workforce composition to one or more theoretical catchment areas—the term used in Northern Ireland for the area(s) from which a company can be expected to draw workers. The test helps to establish that any differential between a workforce and the broader population is not simply random. One or the other group may be significantly underrepresented for a range of reasons, including but not limited to past or present employment discrimination.

Factors considered in defining a catchment area include census data, which provide a general look at local populations, commuting ease, pay levels and the amount of shift work which also affect how far a potential employee is willing to travel. The age structure of a company's workforce and population shifts also may be important. Companies employing younger people may be more heavily Catholic than the general population because more young people are Catholics. Because a catchment area definition depends on these complex variables, data on community representation must be considered with care.

Monitoring Applications and Appointments

The Northern Ireland Service data sets on applicants, based on the monitoring requirements of fair employment legislation, have a considerable blind spot in a few cases. Applicants for jobs in a given year that are not filled until the following monitoring year are not reported. This means that there can be significant gaps in information on applicants and appointees at a few companies that have conducted major recruitment drives beginning in one monitoring year and ending in the next. Appointment and application information is valuable in assessing fair employment.

Appointment and application information can help employers determine if there is a chill factor discouraging applicants from one community. Also, a substantial difference in the proportions among applicants and new hires may indicate the two groups are not treated equally during the selection process. Since it may take years to change an overall work force, some fair employment experts argue a focus on appointees is the best indicator of a company's progress towards fair participation.

Some firms do not appear to monitor applicants and appointees, although fair employment experts say that such monitoring is valuable to employers. The 1989 legislation required private sector employers with more than 250 workers to monitor their applicants. Changes to the fair employment law for Northern Ireland passed by Parliament in 1998 mean that smaller employers also had to begin collecting

this information and report on it in 2001. Monitoring information, even if collected by employment agencies, must be kept on file by the employer. Because employers have these data, it may be useful and easy even for smaller employers to add up the numbers and do some rudimentary analysis. There can be difficulties comparing all applicants with all appointees, however; certain types of jobs may draw applicants from particular areas, or draw much larger numbers of applicants, skewing any direct comparison of all applicants and all appointees. The best analysis—one that would require much more information than the Northern Ireland Service can request but one that employers can perform—compares applicants with the appointee(s) in each recruitment exercise.

COMPANY PROFILES

The next part of the report, prepared by the Northern Ireland Service, presents profiles of U.S. companies that currently have subsidiaries or affiliates in Northern Ireland. Since the Fair Employment and Treatment (Northern Ireland) Order of 1998 sets 10 employees as the cut-off for monitoring and reporting, the profiles are divided into two sections:

- Section I presents the firms with more than 10 employees in Northern Ireland;
- Section II presents the firms with 10 or fewer employees in Northern Ireland.

Each company entry starts with an overview of key fair employment facts that relate to all the parent company's operations in Northern Ireland:

- The type of economic tie the parent company has to the Northern Ireland operation (e.g., equity or franchise),
- whether the company has an agreement on implementation of the MacBride Principles,
- if any of the operations in Northern Ireland have an underrepresentation of Catholics or Protestants and if the company is taking any affirmative action, and
- the number (if any) of Fair Employment Tribunal discrimination findings and/or settlements since 2003.

The MacBride agreement heading refers to agreements between proponents of the MacBride Principles and the companies, or corporate commitments to implement the Principles and cooperate with independent monitoring.

For each subsidiary or affiliate, the facility name is stated, along with the percentage of equity held by the parent firm if less than 100 percent, the location, business line, whether any underrepresentation exists (and for which group) at the operation, and the employee breakdown. Percentages of Catholics and Protestants in each workforce are provided when the total employee count exceeds 30; conclusions drawn from proportional breakdowns below 30 are generally questionable. Subheadings in the remainder of each profile indicate:

- the extent of the company's response to the survey;
- the quality and source of information available;
- compliance with Northern Ireland's fair employment law and Code of Practice;
- whether Catholics and Protestants appear to be fairly represented overall and in specific job categories;
- the company's position on the MacBride principles;
- any affirmative action the company is taking; and
- any discrimination complaints filed against the company at the Fair Employment Tribunal.

The profiles refer to three government agencies in Northern Ireland:

- the Equality Commission for Northern Ireland, which replaced the Fair Employment Commission (FEC) in October 1999;
- the Fair Employment Tribunal (FET), the judicial body that adjudicates complaints filed under fair employment law in Northern Ireland; and

- InvestNI, the Northern Ireland government investment-promotion agency, which replaced the Industrial Development Board (IDB) and other job-promotion bodies in 2002.

SECTION I
U.S. COMPANIES WITH 11 OR MORE EMPLOYEES
IN NORTHERN IRELAND

3M

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	May 1996	Affirmative Action	Yes	FET Settlements	0

• 3M Industrial Tapes

Location	Bangor, Co. Down		
Business	adhesive tapes		
Employees	(Data as of Aug. 2008)		
	Protestant	138	87%
	Catholic	20	10%
	Other	5	
	<u>Total</u>	<u>163</u>	

2009 Survey Response: None

Available information: 3M company manufactures adhesive tape at its Bangor location in County Down. It has cooperated with the Northern Ireland Service, completing surveys and providing access to local managers for interviews several times. Company officials also have periodically met with Northern Ireland Service staff in the United States since 1997.

In 2004, the company took part in a training program partially funded by InvestNI, which it said helped boost profitability to its best level in recent years. The size of 3M's work force shrank about 6 percent a year from 1996 and 2003, cutting a third of its original Northern Ireland work force. 3M's staff now numbers 163 workers.

Compliance with NI fair employment law and Code of Practice: The plant's senior management team has developed fair employment training programs in conjunction with the Equality Commission, and the company has provided its managers with awareness training on equal opportunity, fair employment and sectarian harassment and intimidation. In addition, all employees have been trained in equality awareness and sectarian harassment. 3M also has an exit survey that specifically gathers information on fair employment. The company reports that all employees leaving the company have been aware of the equal opportunities policies. The company's management oversight of equality issues at its Northern Ireland plant appears to have received specific, sustained attention from U.S. corporate management that is somewhat unusual compared to other U.S. firms in Northern Ireland.

Underrepresentation analysis: 3M's Bangor location is in a heavily Protestant district, with Catholics representing less than 15 percent of the population. Catholics appear to be underrepresented in the overall work force and especially among machine operatives.

3M reached an affirmative action agreement with the Equality Commission, which included a target of increasing the Catholic proportion of applicants and appointees to at least 11 percent by 1999, and an overall goal of increasing the Catholic proportion of its manual work force to 11 percent. 3M met these goals and generally has exceeded its target for Catholic applicants. Catholic applicant levels were higher in the late 1990s, but the company told the Northern Ireland Service that vacancies in those years were for highly paid, skilled positions for which candidates would be willing to travel, attracting applicants from areas with more Catholics than its immediate vicinity. Approximately 18 percent of applicants and 11 percent of new hires in the most recent monitoring period were Catholics. The company does not use a last-in, first-out redundancy policy, which can affect one community disproportionately, but bases redundancies on merit or asks for volunteers.

The company has banned the wearing of football soccer shirts in the plant; allegiance to certain teams in Northern Ireland can be extremely sectarian. It also prohibits the display of flags and emblems through a Joint Declaration of Protection most recently signed in April 1996 by the Bangor site manager and a union representative, and no problems appear to have surfaced with this neutral workplace policy. The company is close to parade routes during the summer marching season, but the facility is closed for two days during the height of the season.

Conformance with MacBride principles: The company reported in 2003 that negotiations were underway on affirmative action. Previously, in 1997, the company developed an outreach program

that includes links with schools, colleges and charities, church liaisons, cultural and community events and corporate Earthwatch, an international science and educational charity. The company also started placing ads in the Irish News and the Sunday Life, in addition to the Belfast Telegraph. It began welcoming both communities to apply in 1996. The schools outreach program includes "industry awareness days," recruitment fairs and work experience/placement schemes in which secondary school students visit the company for a week. In addition, 3M reported in the past that it sponsored an annual weekend team building retreat with 20 Catholic and 20 Protestant school children to enhance community relations with the company. Outreach to Catholics also has included sponsoring teams of the Catholic Gaelic Athletic Association. In early 2004, the company noted that some of its outreach initiatives have been scaled back, but that it still supports "a range of activities in the minority community...including work placement weeks and art competitions."

Affirmative action outreach - The company has banned the wearing of football soccer shirts in the plant; allegiance to certain teams in Northern Ireland can be extremely sectarian. It also prohibits the display of flags and emblems through a Joint Declaration of Protection most recently signed in April 1996 by the Bangor site manager and a union representative, and no problems appear to have surfaced with this neutral workplace policy. All employees receive specific training on sectarian harassment in the workplace. Workers have not reported experiencing intimidation or harassment of a religious or political nature in any of 3M's exit surveys, the company says. The company is close to parade routes during the summer marching season, which could prove uncomfortable for Catholic employees. However, the facility is closed for two days during the height of the season.

3M developed its formal harassment policy, which includes a complaints procedure, in consultation with the Equality Commission and employee representatives. The policy provides employees who have a religious or political grievance with access to a member of staff who is co-religionist and initiates the company's disciplinary procedure, if the facts warrant it. Managers note that the average tenure at the facility is 15 years. As a result, they say, coworkers know each other well and the atmosphere is relaxed. The company reviews its harassment policy periodically with employees as a preventative measure, but no employee has ever used the complaints procedure.

Grievances -As of December 2009, the Northern Ireland Service is not aware of any complaints filed against the company at the Fair Employment Tribunal.

Ace Hardware

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

• Eglantine Timber Products Ltd.

Location	Newtownabbey, Bangor, Carryduff	
Business	Hardware stores	
Employees	(Data as of 2007)	
	Total	30

2009 Survey Response: None

Available information: The company has never responded to the Northern Ireland Service survey, although it did reply to an inquiry about its website in 2003. Ace Hardware is a cooperative owned by its member stores. It began its first European foray in 1998 through a joint venture in Belfast with Eglantine Timber, a family owned business established 30 years ago. Three Eglantine stores were listed as an Ace Hardware affiliate on Ace's website in December 2009 (Whiteabbey in the district of Newtownabbey, Bangor, and Carryduff).

Compliance with NI fair employment law and Code of Practice: No information on the company's fair employment practices and policies is available.

Underrepresentation analysis: The Northern Ireland Equality Commission's monitoring report for 2008 was not yet available at the time this profile was written. The Equality Commission's previously available monitoring report showed that as of 2007, the company employed zero to nine Catholics and 30 workers total. Both the number of workers and the presence of fewer than 10 Catholics have been consistent over the past several years. The company may have an underrepresentation of Catholics, but a conclusive assessment is not possible without more information. The Belfast travel-to-work area is 33 percent Catholic and probably the best rough measure for comparison to the work force given the company's primary location in Belfast and two other sites nearby.

In 2003, the Ace Hardware website listing international locations used a sectarian flag to indicate it had operations in Northern Ireland. The flag, which depicts the Red Hand of Ulster, topped by a crown, uses symbolism employed by hard-line Protestants and would not be considered a neutral symbol in the politically charged atmosphere of Northern Ireland. In response to an inquiry from the Northern Ireland Service, a company official said in August 2003 that the use of the Red Hand flag "was in no way intended to insult or offend anyone. I apologize for the oversight." The official said Ace's website "is designed and maintained by an outside source [and] they have been informed to make the correction to the site." The flag no longer appears on the website.

The company's three stores are located in heavily Protestant areas and Catholics might be dissuaded from applying to or working at the company.

Conformance with MacBride principles: The company has no agreement with MacBride advocates but as a private firm also has not received any shareholder resolutions asking it to implement the principles, the usual impetus to an accord.

Affirmative action outreach - None

Grievances -As of December 2009, no complaints have been filed against the company at the Fair Employment Tribunal.

Aecom Technology Corporation

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

• Fabermaunsell

Location	Belfast		
Business	Engineering consulting		
Employees	(Data as of 2007)		
	Protestant	31	60.00%
	Catholic	19	40%
	Other	1	
	<u>Total</u>	<u>51</u>	

2009 Survey Response: None

Available information: Aecom is a leading provider of professional technical services with operations in 60 countries. Its Northern Ireland subsidiary, Faber Maunsell, specializes in building, transportation and environmental engineering consulting. Faber Maunsell merged with Bullen Consultants in April 2005. The combined company operates under the Faber Maunsell name (now Fabermaunsell) and has one office in Belfast. The company Code of Conduct reports to adhere to local laws and to prohibit discrimination based on religion, but not political opinion.

Underrepresentation analysis: Compared with the Belfast travel-to-work area, which is 33 percent Catholic, no group appears to be underrepresented at Fabermaunsell. Without further information from the company, however, it cannot be determined whether any group is underrepresented in any job category.

Affirmative action outreach - None

Aes

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	April 1996	Affirmative Action	Yes	FET Settlements	0

• AES Kilroot Power

Location	Carrickfergus		
Business	Electricity Generation		
Employees	(Data as of 2009)		
	Protestant	108	90.00%
	Catholic	16	10%
	Other	1	
	<u>Total</u>	<u>125</u>	

2009 Survey Response: Full

Available information: AES owns more than 97 percent of AES Kilroot Power Ltd.; employees own the rest. The coal-burning Kilroot Power station is being updated with pollution control equipment to bring it into compliance with EU standards on sulphur dioxide and nitrous oxide emissions. The update will cost rate-payers £45 million and the move is being fought by the Northern Ireland Authority for Energy Regulation. Those opposed to the renovations argued that consumers should not have to pay to keep antiquated forms of energy running. The Department of Enterprise, Trade and Investment in Northern Ireland has urged the company to develop renewable technologies at the plant in addition to its traditional operations.

The company has responded to the Northern Ireland Service surveys every year since 1997, except in 2003; management met with Northern Ireland Service staff in the early 1990s.

Compliance with NI fair employment law and Code of Practice: The company generally appears to adhere to recommendations of the Code, including affirmative action outreach measures that the Code encourages where there is underrepresentation. The company uses systematic hiring and selection procedures and manages an equal opportunities program.

Employee team leaders manage fair employment issues, although there is a monitoring officer who also assists the new team leaders with outreach and social responsibility projects. AES reports that all team leaders have had EEO awareness training and will be kept up to date with current legislation; the team leaders are responsible for recruitment, selection, training and performance reviews.

AES does not publicly advertise all openings, citing the continual downsizing of its work force. (The work force slightly increased in 2006 but it is half the size of its work force in 199.) The company used to advertise jobs in a range of newspapers, ensuring widespread notice of job vacancies, but in its most recent survey response the company reported that it advertises in the Belfast Telegraph, and also recurs to recruitment agencies for specialist roles. It also reported that jobs are sometimes advertised internally and throughout the AES Corporation. The company uses an interview panel when selecting new hires, but it does not guarantee that both communities are represented on the panel.

The company's Northern Ireland board of directors and senior management at the two power stations issued an open letter in 1995 "to the people of Nigen and Northern Ireland" stating their support for fair employment practices and policies. The letter was posted on the company's notice board and published in its newsletter. The company meets regularly with the Equality Commission. Northern Ireland senior management oversee the company's equality policy.

Underrepresentation analysis: Although the percentage of Catholics at Kilroot is very small, the company is located in an area that was only 9.7 percent Catholic at the most recent census. The Northern Ireland Service uses all of Northern Ireland as a catchment area for managerial jobs and the surrounding region as a catchment area for associate and professional jobs, which account for nearly 85 percent of the work force. Using these catchment areas and an overall weighted catchment area, Catholics are slightly underrepresented throughout the rest of the work force, considering furthermore the application pool and new hires, below. Managers are on the contrary fairly represented. Moreover, there are no SOCs where both communities are represented (the company employs in SOC1, SOC3,

and SOC4). In the most recent monitoring period, the company hired 4new workers all Protestants. The company disclosed that for these positions applied 41 Protestant and 3 Catholics.

Conformance with MacBride principles: In 1996, AES agreed to implement those MacBride principles that are "lawfully in line" with fair employment legislation in Northern Ireland.

Affirmative action outreach - The AES plants have used positive actions encouraged by Northern Ireland's fair employment law and the Equality Commission to reach out to the Catholic community. In 1993, the company became one of the first major companies with underrepresentation to include a welcoming statement in its recruitment advertisements. The company has done minimal recruiting in the last several years. In previous years, Kilroot also had an apprenticeship training program that had seen a steadily rising percentage of Catholic applicants. AES attributed the rise to increased outreach to schools and communities, particularly Catholic schools.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal as of August 2009. The company's grievance policy allows employees to file complaints confidentially and to raise issues with someone other than their immediate supervisor.

Allen Systems Group

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	December 2006	Affirmative Action	No	FET Settlements	0

• Allen Systems Group

Location	Belfast		
Business	Software development		
Employees	(Data as of August 2008)		
	Protestant	14	50.00%
	Catholic	15	52%
	Other	0	
	<u>Total</u>	<u>29</u>	

2009 Survey Response: Partial

Available information: The company, a privately held firm based in Florida, began operations in Northern Ireland in January 2004 and expects ultimately to employ 168 people developing software. In October 2003, Allen Systems Group invested £3.6m in a new technology development in Belfast. The company did not respond to inquiries from the Northern Ireland Service until 2006, and in 2007 the company reported that it has 35 employees including 30 with identified community affiliation. The company responded partially to the Northern Ireland Service's survey in 2009, showing that its workforce no longer included non-affiliated employees, whereas the Catholic representation registered one worker less and Protestant employees remained steady. Figures suggest that the 17-percent contraction in the workforce concerned almost exclusively non-affiliated individuals. Allen Systems reports that all of its employees with identified community affiliation are professionals or managers, for which the Northern Ireland Service uses all of Northern Ireland as the catchment area. While slightly fewer Protestants are employed by the company than might be expected, this difference is not statistically significant. Also in 2009, the company reported that its policies reflect the fair employment standards embodied by the MacBride principles, and it agreed to comply with monitoring by the Northern Ireland Service. The responsibility for the company standards is upon local managers, where as the company's equality policy for Northern Ireland is overseen by Northern Ireland senior management, U.K. management, and Corporate headquarters. However, the company reported never to consult with trade unions or other worker representatives on equality policy issues. No complaints have been filed against the company at the Fair Employment Tribunal. In case a complaint of religious or political discrimination were filed, the company's grievance procedure for complaints provides for filing confidentially to someone other than a direct supervisor and to a clearly independent person of the same community background.

Allstate

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	November 2000	Affirmative Action	No	FET Settlements	0

• Northbrook Technology of NI Ltd.

Location	Belfast, Derry, Strabane		
Business	Call centers, IT services		
Employees	(Data as of 2009)		
	Protestant	478	40.00%
	Catholic	837	64%
	Other	292	
	<u>Total</u>	<u>1607</u>	

2009 Survey Response: Full

Available information: Northbrook Technology opened its Belfast facilities in 1999 and changed locations within Belfast in 2002. The company has grown substantially since its founding and currently employs 1,607 full-time workers, growing its workforce by 8.3 percent company-wide from the previous survey response, when it listed 1,483 employees. Company representatives said they are focused on recruiting workers from Poland and India because they believe there is a lack of skilled IT workers in Northern Ireland. Competition from Citibank has put a further squeeze on the shortage of labor. This trend is shown in the community breakdown, outlined above, where non affiliated employees are more represented than in other companies in the country, and is confirmed by the non-affiliated rate of applications and new hires, where they are greater than Protestants. Employment has nearly doubled since 2004 because it opened a new facility in Strabane and added a new office to its facility on the Magee campus. (Northbrook refers to the latter site as Magee to avoid sectarian labels of Derry or Londonderry). The company workforce increased also last year by 8.4 percent since last monitoring period, quite homogenously spread among the communities, with a slight Catholic majority (Protestants grew by 7.7 percent, Catholics by 10.1 percent, and non affiliated by 4.7 percent. InvestNI contributed £5.5 million to the new Strabane location, which is to produce 260 jobs. The Strabane facility currently employs 402 workers. The company has regularly responded to monitoring by the Northern Ireland Service and Service staff meet with company representatives in 2005.

Compliance with NI fair employment law and Code of Practice: The company's policies adhere to the standards established by the Fair Employment and Treatment (Northern Ireland) Order 1998, and follow the recommendations and requirements of the Code of Practice. It appears to treat equality issues seriously and has developed strict formal processes for the recruitment and selection of employees. Human resources managers say that Northbrook is always interested in talented workers and therefore places constant recruitment ads in the newspapers. All employees are notified through company intranet about positions open to internal applicants. As far as external applications are concerned, the company uses the Belfast Telegraph for vacancies in both Belfast and Derry, and also uses the Derry Journal and the Donegal Democrat for positions in Derry. It also advertises on the Internet, the company reported in its latest survey response. When recruiting for specific positions, the company first advertises internally if the position requires special knowledge, then places ads externally. A team of employees reviews the resumes and creates a short list of candidates, who then must take an aptitude test to qualify for an interview. All candidates face a panel of interviewers who represent both communities. Northbrook trains all its interviewers on recruitment and selection techniques to ensure that all interviews have a consistent format and that no informal discussions arise that could introduce inappropriate information about a candidate. Company representatives have said that the shortage of skilled IT workers means that companies such as Northbrook "can't afford to have poor fair employment practices."

Northbrook provides diversity training for all its employees as well as training on Northern Ireland fair employment legislation. It borrows from Allstate's U.S. diversity training programs and adapts the material to a Northern Ireland-specific program. Line managers receive special training on equality and selection techniques, and the human resources team attends regular training sessions with the

Equality Commission. The company's director of human resources previously spent ten years as a lawyer with the FEC, now the Equality Commission. According to the company latest company response, Northern Ireland senior management oversees the company's equality policy in Northern Ireland, although Managers in Northern Ireland said in a previous response that U.S. senior managers are knowledgeable about Northern Ireland equality issues and regularly visit the Belfast office. In June 2006, this office won an award for its Diversity and Equality Programme.

Underrepresentation analysis: Protestants appear to be underrepresented at Northbrook when the work force is compared to site-specific catchment areas. Company-wise, Catholics are twice as Protestants (52.1 to 29.7 percent, whereas 18.2 percent of the company workforce is not affiliated to either community), increasing with respect to 2008 data (51.2 to 29.9 percent). Northbrook has three locations, one in the city center of Belfast and the other two in Strabane and Derry. It recruits workers for the Strabane and Derry offices from the local area as well as from the Republic of Ireland because both locations are in close proximity to the border. Protestants are underrepresented in each of the three workplaces, particularly among managers and professional occupations. In Strabane, Catholics account for 278 of 402 employees at the facility, whereof 265 are employed only within SOC7 Sales/Customer Services.

The company's efforts in recruiting from the ranks of the unemployed are ground breaking; it conducts mock interviews and provides resume training to help applicants prepare for potential opportunities. Significant portions of these applicants are third generation unemployed.

The company said in the previous survey response that the jobs at the Strabane site are lower level and unskilled positions, which are filled by staff who walk to work. This would create a much narrower catchment area that may not show any Protestant underrepresentation. Applicant and new hire figures in the last few years show an increase in the proportion of Protestants, but have remained heavily Catholic. In 2009, out of the 1,835 received applications, only 374 were sent by Protestants (27 percent) where as 941 were sent by Catholics (70.2 percent) and the resting 520 applications were sent by non affiliated (38.8 percent, confirming the company's strategy to attract non locals, at least for IT-skilled jobs). Looking at figures for new hires, these numbers are more equaled. Despite the Catholic presence is still overwhelming (79 percent), 32 percent of new hires declared to be Protestant, whereas the affiliatio of a 36.9 percent of new hires was not possible to determine. The company reported in its previous survey response that it did not believe any group is underrepresented at its operations, noting that the Equality Commission had not raised any concerns about its annual monitoring return.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation in November 2000. Allstate told the New York City comptroller at the time, "We have and will continue to make all lawful efforts to conduct operations in Northern Ireland in accordance with applicable fair employment standards and practices, including those embodied in the MacBride principles." The company also confirmed in its latest survey response it would continue to cooperate with monitoring by the Northern Ireland Service.

Affirmative action outreach - Affirmative action outreach - Data suggest that Northbrook is obligated to try to attract more Protestant applicants. Northbrook disagreed. The company participates in several outreach initiatives to train potential employees in local communities. One program aims to bring disadvantaged youth from south and east Belfast into employment, which could have the effect of boosting Protestant applicants. Northbrook has also won several awards for gender diversity and for investing in its employees. The company advertises in local papers that reach both communities for job openings at the Strabane and Derry sites. In Strabane, the company also utilizes a local job center that posts advertisements online.

Grievances -The Northern Ireland Service is unaware of any complaints filed against the company at the Fair Employment Tribunal. In its latest survey response, the company disclosed that its grievance procedure for complaints of religious or political discrimination provires for both filing a complaint confidentially, to someone other than the direct supervisor, and to a clearly independent person of the same community background.

Aon Corp

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	December 1991	Affirmative Action	No	FET Settlements	0

• Aon Risks Services (NI) Ltd

Location	Belfast
Business	Insurance Brokerage & Life & Pensions Consultants
Employees	(Data as of 2009)
	Total 40

2009 Survey Response: Full

Available information: Aon McMillen offers insurance broking and financial investment advice through its Belfast office. It responded in full to the Northern Ireland Service survey for the last four years after sporadic updates in 2001 and 2003 and a fairly detailed letter in 2000 about its fair employment policies. Northern Ireland Service representatives met with Aon McMillen in 2005. The company's work force has remained stable over the last eight years and company representatives said they did not foresee any major shifts. The company's main source of revenue is insurance sales to commercial and corporate businesses; it also sells personal insurance.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to all fair employment standards established by Northern Ireland law and it appears to follow many recommendations of the Code. Aon publicly advertises all openings and informs all employees about vacancies. It uses the Belfast Telegraph, Irish News, local and regional newspapers and government job markets to fill positions. Aon always uses interview panels with more than one interviewer, although both communities are not always represented on the panels. All employees involved in candidate selection have received training on equal employment issues, and the company sometimes reviews the religious composition of applicant pools. Senior managers in Northern Ireland are responsible for fair employment matters (the proportion is however seven Protestants per one Catholic in this SOC)..

Underrepresentation analysis: Also in 2009, Catholics appear to be underrepresented in Aon's overall work force and in the two higher level employment categories at the company, managers (SOC 1- seven Protestants and one Catholic) and associate professionals (SOC 3- 16 Protestants and no one Catholic). The Northern Ireland Service estimates from these numbers that all of Northern Ireland is the recruitment area for managers, while the narrower Belfast travel-to-work area is most appropriate comparison for associate professionals and technical workers (20 workers with identified religion, all Protestant) and clerical staff (12 workers with identified religion). The resulting weighted catchment area is 34.8 percent Catholic, but the Catholic share of the work force has even decreased from 7 percent in 2008 to 2.9 percent in 2009. In 2009 the company also registered three redundancies, two Protestants and one non affiliated.

Aon reports that it has a high staff retention rate, which prevents it from changing the composition of its work force.

Aon McMillen reports to its Dublin office as operations in the Republic and Northern Ireland are run as one company. Company representatives noted that when all employees of the firm (including workers in the Dublin office) are taken together, Catholics make up about 70 percent of the work force. Aon also noted that its board of directors is drawn from both communities.

Conformance with MacBride principles: Alexander & Alexander, a predecessor firm, reached an implementation agreement on the MacBride principles in 1991, and Aon reported in 2004 that its policies still reflect the MacBride principles. The company consistently responds to the Northern Ireland Service survey.

Affirmative action outreach - The company appears to have a responsibility under Northern Ireland's fair employment law and the MacBride principles to conduct affirmative action aimed at increasing the Catholic proportion of its work force. The company does not have an affirmative action agreement with the Equality Commission and has set no goals and timetables regarding Catholic

employees. Company representatives have never met with the Equality Commission or been asked to conduct affirmative action outreach. Given the low portion of Catholic applicants, the company may need to step up its recruitment efforts. The firm reported that it is difficult to recruit qualified applicants and it does not offer any entry-level positions.

In 2000, the company reported that it expected to boost the Catholic portion of its work force through an acquisition of a company with a predominately Catholic staff, but to date Aon has not acquired any new businesses in Northern Ireland.

Grievances -The company reported that a female Protestant employee filed a sexual discrimination complaint against the company at the Fair Employment Tribunal in 2004 and withdrew the complaint in 2006.

Apollo Management LP

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

• Claire's Accessories UK

Location	11 locations province-wide		
Business	Fashion accessories		
Employees	(Data as of 2007)		
	Protestant	65	50.00%
	Catholic	56	50.00%
	Other	21	
	<u>Total</u>	<u>142</u>	

2009 Survey Response: None

Available information: Claire's Stores has 18 locations around Northern Ireland including Ballymena, Enniskillen, Newtownabbey, Bangor, Omagh, Newry, Craigavon, Newtownards, Lisburn and Belfast.

Compliance with NI fair employment law and Code of Practice: Claire's says it complies with the local fair employment laws in Northern Ireland and the Code of Practice, and cooperates with the Equality Commission. The company makes its employees aware of all job openings, which are publicly advertised on the Internet, in the Belfast Newsletter, other local papers and on notices posted in job centers and on store windows. An EEO statement is included in employment advertisements and EEO training is provided to employees involved in hiring processes. When selection panels are used to review candidates, the company does not attempt to have both communities represented, which can be difficult for smaller employers. In its survey response, the company said "all employees in skilled and upper level jobs have access to all programs included in our training manual."

The company says Claire's "strives to ensure that all employees and candidates are treated equally and exposed to all job and promotional opportunities available, regardless of background, religion, or beliefs." It says it encourages "all employees and candidates from all religious backgrounds."

Staff at the corporate headquarters oversee the company's equality policy.

Underrepresentation analysis: No group appears to be underrepresented when the company's work force is compared to the working age population in Northern Ireland as a whole, the best comparison given the company's locations around the province and the employment category.

Conformance with MacBride principles: The company has no agreement on the MacBride principles. Claire's first shareholder resolution on the subject received 12 percent support in 2003, 7.9 percent in 2004, 12.1 percent in 2005 and 14.9 percent in 2006. The company went private in 2007, ending the opportunity for proponents to submit resolutions. The company says the principles are unnecessary because its operations are already fair and existing Northern Ireland fair employment law is sufficient to ensure equity. The company has responded to the Northern Ireland Service survey for the last couple of years, although it did not respond in 2007.

Affirmative action outreach - No affirmative action measures are warranted.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal as of August 2009. The company's grievance procedure allows workers to raise issues with someone other than their immediate supervisor.

AVX

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	February 1998	Affirmative Action	No	FET Settlements	0

• AVX Ltd.

Location	Coleraine		
Business	Electronic Components		
Employees	(Data as of 2009)		
	Protestant	254	80.00%
	Catholic	77	20.00%
	Other	14	
	Total	345	

2009 Survey Response: Full

Available information: The company has regularly responded to the Northern Ireland Service survey, and NIS staff has interviewed local company officials in Northern Ireland three times, most recently in 2006. AVX also provided copies of its triennial review required under Northern Ireland's fair employment law.

AVX had been one of the largest U.S. employers in Northern Ireland for several years, although its work force has shrunk considerably from a high point of 1,395 employees in 2001 and now stands at 345. In april 2009, however, Belfast News reported an article from Belfast Telegraph in december 2008, where AVX announced it was making 92 redundancies and in Carrick Ryobi, which also Manufactures parts for the motor industry, confirmed plans to axe around 100 posts. In that article, the Belfast Telegraph estimated the workforce at the company consisting of 390 people. Market conditions have been responsible for employment fluctuations. Kyocera Corp., a publicly traded Japanese company, owns 70 percent of AVX stock, which is traded in the United States.

Compliance with NI fair employment law and Code of Practice: AVX's equal opportunities policy appears to conform with Northern Ireland's fair employment law. It calls for periodic review of selection procedures, staff development, publicizing the policy and filing grievances. Specific responsibility for implementation of the policy is placed on managers, supervisors and other staff members who recruit and train employees, as well as those responsible for personnel matters.

While the Northern Ireland senior management is responsible for overseeing the company's equality policy in the country, the group industrial relations manager is responsible for overseeing fair employment matters at the company. The trade union "is consulted fully and supports the company" in EEO matters, AVX said. The company has completed voluminous reports for its triennial reviews that it must submit to the Equality Commission. Managers have attended equality management workshops and AVX says it provides workshops and training for all employees to address potential sectarian harassment and intimidation in the workplace.

Hiring procedures appear to be systematic, with interview panels, sometimes representation from both communities and EEO training for staff involved in the process. Job advertisements, which include an EEO statement, are placed in the Belfast Telegraph as well as local and regional newspapers and local job markets. AVX also tracks applicant success rates by religion to identify differential success rates. The company says it undertakes its training and employee development programs "without reference to employees' perceived religious beliefs." Finally, there is no formal redundancy procedure in place at the company; AVX says it retains "those employees who are best suited to the company's requirements."

Underrepresentation analysis: Catholics appear to be underrepresented at the company overall and among professionals, skilled workers, sales associates and machine operatives. The Northern Ireland Service compared managers, professionals and skilled employees to Northern Ireland's working age population (42.7 percent Catholic) and associate professionals, administrative staff, machine operatives and elementary occupations to the Coleraine district council area (34.1 percent Catholic); this area, weighted by job category, is nearly 36 percent Catholic.

Catholic representation at AVX has fallen from a high of 28 percent in 2001 to the present level of about 23.3 percent. The company has estimated that almost 70 percent of its employees come from the Coleraine district council area, which is 34 percent Catholic according to 2001 census data. Another 17 percent come from nearby Ballymoney, which is 32 percent Catholic.

After hiring 11 additional workers in the 2007 monitoring period (none of whom were Catholic) the company had no new hires in the 2008 monitoring period. On the contrary, the company has shown redundancies distributed as follows: 79 Protestants, 29 Catholics, and 4 non-affiliated employees (and especially in machine operatives SOC-wise). The community distribution within the company workforce in Northern Ireland is available in the table above. As far as community representation is concerned, the company decreased the number of its employees by 28 percent in average from the 2007 to the 2008 monitoring period. However, this workforce contraction seems to have affected mainly the Catholic community. In fact, from the above data about redundancies, the following rate per community can be derived: 28 percent, 31 percent, and 26 percent for Protestants, Catholics, and non affiliated respectively. Consequently, the Northern Ireland Service underrepresentation analysis is maintained, and Catholics still appear to be underrepresented at AVX in Northern Ireland.

Several years ago, the Northern Ireland Service staff noted pro-unionist red, white and blue stripes painted on the entrance sign posts of the Ballycastle Industrial Estate, where AVX's Coleraine plant is located, which was no longer visible on the most recent site visit in 2006.

Conformance with MacBride principles: The company has had an agreement to implement the MacBride principles since 1998. AVX reports that its policies reflect the fair employment standards embodied in the MacBride principles and it has honored its commitment to comply with monitoring by the Northern Ireland Service. In addition, in the 2009 survey, the company reminded that it is "compliant in so far as it is practical to do so, while adhering to the legal requirements of the NI legislation."

Affirmative action outreach - AVX has said its work force fairly represents its catchment area and believes no affirmative action efforts are needed. Given the local demographic changes and the shift in work force representation, the company may need to reassess this view. In 2003, when the company last did any major hiring, Catholics appeared to be overrepresented among applicants and new hires, but both communities have been fairly represented among applicants and new hires for the last few years.

Grievances -One person filed three complaints against the company at the FET in 2003. They were all conciliated in 2005. AVX said the complainant alleged discrimination after he was provisionally selected for redundancy. The company declares it has no outstanding claims, and this consistent with the Fair Employment Register as of August 2009.

AVX has a grievance policy, which enables employees to file confidential complaints and to raise a grievance with someone other than their direct supervisor.

Bain Capital

MacBride Agreement Agreement Date	No	Underrepresentation Affirmative Action	Yes No	FET Discrimination Findings FET Settlements	0 1
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• Domino's Pizza

Location	12 locations province-wide
Business	Carryout pizza
Employees	(Data as of 2008)
	Total 35

2009 Survey Response: None

Available information: Domino's held its initial public offering on July 13, 2004. Private firm Bain Capital owns 45 percent of Domino's stock. The pizza company franchises more than 90 percent of its locations, and recently has been expanding internationally. The company has 11 stores in Northern Ireland: Belfast (4 locations), Bangor (3 locations), Ballymena, Coleraine, Lisburn (2 locations) and Newtownabbey. Neither Bain Capital nor Domino's has responded to inquiries for further information about fair employment policies at the operations in Northern Ireland. Because the operations are franchises, they do not report under the Domino's name to the Equality Commission, and no information is available on the number of people employed or the religious breakdown.

Compliance with NI fair employment law and Code of Practice: In 2007, the New York City pension funds for the first time proposed a shareholder resolution asking Domino's to implement the MacBride principles. When the funds found that the company's proxy did not include their resolution, they approached the company with proof that the proposal had been received in its mailroom. To spare the company the expense of a supplemental mailing, New York offered to withdraw the proposal if the company agreed to implement the principles, which would have required it to agree to respond to the annual Northern Ireland Service survey about its policies and employment statistics in Northern Ireland. According to a New York City representative, Domino's initially seemed receptive, but several days later told the proponents that "Domino's has determined that it is not willing to, nor to undertake to urge its franchisee to, come under the review of IRRC" (the former parent of the Northern Ireland Service, which is now part of RiskMetrics).

At that point, Domino's asked New York to "withdraw the proposal for this year and allow us to include it in next year's proxy to avoid the expense of mailing." New York declined, and 14 days before the annual meeting, the company sent out supplemental materials containing the resolution. The materials did not include an official company statement of opposition; because of the tardiness of the notice to shareholders, SEC rules prevented the company from printing one.

Domino's management opposed a 2008 New York City shareholder resolution requesting compliance with the MacBride principles; the resolution received 2.5 percent support, leaving it ineligible for resubmission. While this is an unusually low vote for a MacBride proposal, a New York City representative explained that the founding family owns a large chunk of Domino's stock.

In its Northern Ireland's Web site, the company links its equal employment opportunity policy, which bans religious belief but not political opinion.

Grievances -In 2006, Domino's Pizza settled a claim brought against it at the Fair Employment Tribunal. However, since then no further claims were filed before the FET as of August 2009.

Bain Capital

MacBride Agreement	No	Underrepresentation	NA	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	1

• Toys 'R' Us

Location	Newtownabbey and Londonderry		
Business	Toy Retailing		
Employees	(Data as of 2007)		
	Protestant	72	60.00%
	Catholic	50	40.00%
	Other	12	
	Total	134	

2009 Survey Response: None

Available information: Toys R Us was acquired by an investor group led by Bain Capital, Kohlberg, Kravis Roberts and Vornado Real Estate Investment Trust in mid-2005. The company's initial response to monitoring by the Northern Ireland Service came in 1999, when it also met with Service staff at its north Belfast store. A second store opened in Londonderry in 2007. The two stores sell toys, baby care and family leisure and home entertainment multimedia products.

Compliance with NI fair employment law and Code of Practice: The company says it is an equal opportunity employer and fully complies with all aspects of Northern Ireland fair employment law. Its policies and programs appear to be consistent with the Fair Employment and Fair Treatment Order 1998 and the Code of Practice. It reports "all procedures and policies were agreed with the FEC prior to any recruitment commencing." Managers attend Equality Commission training, and the company posts its policies in all stores. The company always notifies all employees about positions open to internal applicants, and all employees receive training on equal employment issues. Toys R Us does not need to advertise job widely; signs posted in its Belfast store generate sufficient numbers of applicants. When using panels for job interviews, the company ensures that both communities are represented. It also says it systematically tracks applicant success rates by religion. The company promotes employees by merit and typically promotes from within for managerial posts.

Toys R Us has a world-wide equal opportunities policy that says "all recruitment, promotion and training will be based upon an individual's ability and job performance and will exclude any consideration of an applicant's/employee's religious beliefs, political opinion, race, sex, marital status or disability....Toys R Us will not directly or indirectly discriminate on the grounds of religious belief or political opinion....Breaches of this policy will be regarded as a disciplinary offense." Local management is responsible for complying with local fair employment legislation and, as recommended by the Equality Commission, direct responses to questions about religious affiliation are sent to independent personnel departments at the head office, according to the company. A confidential help line also exists for employees to voice questions or concerns.

Underrepresentation analysis: Neither group appears to be underrepresented at the company overall when its work force is compared to a catchment area that includes all of Northern Ireland. Employees at Toys R Us are either managers or sales associates and both of these employment categories have the widest recruitment area.

Conformance with MacBride principles: Toys R Us reached an agreement on implementation of the MacBride principles in April 1999 after receiving a shareholder proposal, but the companies that acquired Toys R Us have not endorsed the principles.

Affirmative action outreach - No affirmative action efforts currently appear warranted given the work force breakdown at the company. The company's EEO policy commits it "to adopt, where practical, affirmative action measures to ensure the provision of equality of opportunity and fair participation of Roman Catholics and Protestants."

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal.

Baker Hughes

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	February 2007	Affirmative Action	Yes	FET Settlements	0

• Hughes Christensen

Location	Belfast		
Business	Oil drilling equipment (rock bits)		
Employees	(Data as of Aug. 2008)		
	Protestant	275	90.00%
	Catholic	28	10.00%
	Other	5	
	<u>Total</u>	<u>208</u>	

2009 Survey Response: None

Available information: Baker Hughes, which entered the Northern Ireland market in 1954, was the first U.S. engineering company in the province. Hughes Christensen has consistently responded to the Northern Ireland Service annual survey and company representative have met with Northern Ireland Service staff, most recently in 2006. Employment at the company has fluctuated with the fortunes of the oil industry as a whole; its most recent high point was 350 workers in 1998, while its most recent low point was 237 in 2000. It reached 336 workers in 2001 before falling back to the present level of 308. The business Telegraph reported on Sep. 15, 2009, that nearly 100 jobs are expected to go at Hughes Christensen’s East Belfast engineering facility, due to a fall in oil and gas exploration hitting demand for the drill bits it makes. The company, has already axed 135 jobs since the start of the year and is moving part of its Belfast production to Texas.

Compliance with NI fair employment law and Code of Practice: The company appears to adhere to many recommendations of the Code, particularly in its work force monitoring and hiring procedures. Hughes has provided training for supervisors and management on harassment, equal opportunity policy and discipline issues, on what it terms an "ongoing" basis. The company's equal employment opportunity policy, last updated in 2005, states its commitment to "equal employment opportunity in all employment-related practices." Hughes also reviews selection criteria on an ongoing basis, and personnel who hire employees also receive training on proper techniques, including equal employment. Selection panels use cross-community representation "where possible."

The Fair Employment Commission (now the Equality Commission) noted some years ago that the company had "carried out a thorough and comprehensive review that fully complies with the fair employment legislation," and said that a "considerable amount of work has been carried out on practices and procedures and affirmative action."

Underrepresentation analysis: Catholics are significantly underrepresented, and the location of the company poses a significant chill factor for Catholic employees. For its size, Baker Hughes has the lowest proportion of Catholics of any U.S. firm in Northern Ireland. Expansions and new investment at times over the years have had virtually no effect on Catholic representation. Catholics in the labor pool in the Belfast and Castlereagh areas account for about 22 to 33 percent and about 43 percent for all of Northern Ireland. The Northern Ireland Service compares higher level positions to all of Northern Ireland and lower level position to the more narrow Belfast and Castlereagh areas, which suggests the overall work force should be about 34 percent Catholic. The proportion of Catholics at Hughes Christensen hovered at around 7 to 8 percent between 1999 and 2001, then jumped to 9.9 percent in 2002 before dipping a little to 9.5 percent in 2003 and remaining steady at 9.6 percent in 2004. Catholic representation dropped to 8.8 percent in the 2005 monitoring period because the company hired 19 additional employees, 18 of whom are Protestants. It edged up slightly in 2006 to 9 percent, where it remains. Nearly all of the company's recent hires have been Protestants. Of the 109 workers hired between 2001 and 2003 with an identified religion, only 17 were Catholic (15.6 percent). Although this percentage appears small, it was a significant jump from Catholic representation among new hires between 1999 and 2001, which was only about 10 percent. The

company met its reported target of Catholics comprising 25 percent of new hires in 2006, but fell well short of this goal in 2008, when only 10 percent of 30 new hires were Catholics.

The location of Hughes Christensen's plant in Castlereagh poses a substantial chill factor to Catholics. Management says it provides security for workers on the job but not traveling to and from work.

Conformance with MacBride principles: Hughes Christensen agreed to implement the MacBride principles in February 2007 after New York City pension funds agreed to withdraw a resolution in return. The shareholder advocates had been asking the company to adopt the principles since 1988.

Affirmative action outreach - Hughes Christensen reports that the Equality Commission "has commented on the good work" that it and other local companies have done in their local outreach efforts as part of the Castlereagh Equality Forum. Yet despite its efforts, Hughes Christensen cannot report significant results. In 2004, the company's personnel manager made a presentation on the forum's work to other employers planning to take similar action elsewhere in Northern Ireland; she reports that the forum's work is seen as an example of "best practice." Hughes Christensen reached an affirmative action agreement with the old FEC (now the Equality Commission) in January 1997. The plan set a target of at least 15 percent for Catholic applicants and appointees for all posts for the 1998 monitoring year, at least 20 percent for 1999 and at least 25 percent for 2000. The company also agreed to an overall target for the work force of 25 percent Catholic over time.

Hughes previously met its 25 percent Catholic new hire goal in 2000 when it hired two Catholics and six Protestants, despite Catholics making up a little less than 10 percent of applicants. It met this goal again in 2006, but fell short in 2007, when 20 percent of new hires were Catholic. Hughes says it is committed to an ongoing assessment of its progress toward affirmative action goals, and notes that its senior management team annually looks at fair employment issues "to ensure continuous improvement."

Outreach measures identified in the affirmative action agreement include ensuring that recruitment advertisements reach all communities and that job advertisements for hourly paid workers include a welcoming statement for the Catholic community. In addition, the company recruits through government training and employment agency offices and staff are encouraged to advertise vacancies through all offices in the relevant catchment area, including predominately Catholic West Belfast. The company also agreed in its affirmative action plan to maintain and develop new links with schools, training schemes, job clubs and influential leaders and organizations in the Catholic community. If the applicants' flow shows underrepresentation of any community, the company will consider how to develop additional links with the community. Hughes established further links with more schools in 1998 and 1999. In 2000, it placed ads in the Andersonstown News, a nationalist paper in West Belfast. In 2002, the company told the Northern Ireland Service that it also joins with other local employers to benchmark and share affirmative action strategies. Further actions and a review of its hiring practices appear to be in order as Catholics continue to be significantly underrepresented in the work force. In 2006, company representatives said Hughes Christensen was working with the Equality Commission to come up with innovative ways to reach the Catholic community.

Grievances -No fair employment grievances have been filed against the company in recent years, as of August 2009.

BE Aerospace (UK)

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	Yes	FET Settlements	0

• BE Aerospace

Location	One facility in Killeel, County Down		
Business	Manufacture of aircraft seat		
Employees	(Data as of 2007)		
	Protestant	315	50.00%
	Catholic	347	50.00%
	Other	60	
	<u>Total</u>	<u>722</u>	

2009 Survey Response: None

Available information: BE Aerospace Northern Ireland's facility manufactures Business Class & Main Cabin seating environments. Since its 1993 acquisition of Aircraft Furnishings, Ltd., BE Aerospace has not responded to the Northern Ireland Service survey and has provided little information to investor proponents of the MacBride principles. In 1996, a company official said a response to these inquiries would be "a waste of time and money." Some information has been available from proxy statement materials filed by BE Aerospace at the SEC in response to shareholder proposals. Overall employee data are available from the Equality Commission and local news reports.

Compliance with NI fair employment law and Code of Practice: The company reports that it "is an equal opportunity/affirmative action/e-verify employer" in all job advertisements, and hiring procedures are based on the experience and qualifications needed to satisfy individual job requirements." Further, the company says that its policies for training, advancement, layoff and recall procedures are fair, sectarian emblems are not permitted in the workplace, and the company provides security for all at work. The company met with representatives of the Equality Commission in 1998.

Underrepresentation analysis: In the 2007 monitoring period, BE Aerospace (UK) went from being under 47 percent Catholic to over 52 percent Catholic, a particularly significant shift in light of the fact that Catholics have historically been slightly underrepresented in the work force at BE Aerospace. Approximately 53 percent of the 229 new hires in 2007 with identified religious affiliation were Catholic. Compared to a catchment area encompassing all of Northern Ireland, both groups are fairly represented. Killeel, where the company's plant is located, is only 23.6 percent Catholic, although the county as a whole is 61.4 percent Catholic.

Sectarian symbols are very evident in parts of Killeel, so there may be a chill factor discouraging Catholic applicants. Fair employment experts in Northern Ireland noted the proportion of Catholics at the company was, in their eyes, surprisingly high given the hard-line character of the town.

Conformance with MacBride principles: BE Aerospace has been at odds with the New York City Comptroller's office about whether it is adhering to the MacBride principles. BE Aerospace has said in its proxy statements that it already has taken the steps necessary to provide equal employment opportunity in Northern Ireland. It also has said that it has an established EEO program, and its subsidiary operation "essentially complies with the practices outlined in the MacBride principles." However, the lack of more detailed information on its policies and practices makes it impossible to verify these statements. A component of MacBride compliance is to cooperate with independent monitoring of policies and employees, and BE Aerospace clearly has not done so.

The company has urged shareholders to vote against proposals asking it to implement the MacBride principles in every year between 1995 and 2002, aside from 1997, when no proposal was submitted. Investors gave 7.6 percent support to a shareholder resolution asking for MacBride implementation at the company's 2002 annual meeting down from 31.5 percent in 2001. The proposal was ineligible for reconsideration until 2006, when the New York City funds re-filed the same proposal. The resolution got 10.5 percent support in 2006 and 12.6 percent in 2007.

Affirmative action outreach - The rise in Catholic representation at the company over the last several years indicates the company has made some affirmative action efforts, although the company

has provided no information on its efforts to the Northern Ireland Service. Beginning in 1996, recruitment ads in Northern Ireland newspapers started to carry notices that the company is an "equal opportunity employer, consequently applications are welcome from all sections of the community, irrespective of sex, race, and perceived religious/political beliefs."

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal.

Bemis

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	November 1997	Affirmative Action	Yes	FET Settlements	0

• Perfecseal Ltd.

Location	Derry		
Business	Medical Packaging		
Employees	(Data as of Aug. 2007)		
	Protestant	36	20.00%
	Catholic	197	80.00%
	Other	15	
	Total	248	

2009 Survey Response: None

Available information: The company has provided detailed information on its work force and fair employment policies and has consistently completed monitoring by the Northern Ireland Service until recently, whereas it has not responded to the 2009 survey, to which it has not responded. Perfecseal's human resources administrators met with the Northern Ireland Service most recently in 2006. The company's work force dipped to 154 in 2002, down from a high of 181 in 2000, because of manufacturing efficiencies. It gained a handful of employees in 2003 and 2004 and in 2008 it reported the largest staff to date of 248 employees.

In June 2006, 96 workers were let go after they held a prohibited union meeting during work hours. Management, local politicians and the trade unions came to an agreement a week later and all of the workers were rehired. The company moved to a new location in 2007 because it had outgrown its current facilities. The new site is located on the other side of the River Foyle, which essentially divides the Protestant and Catholic areas of Derry. Before the move, company representatives told the Northern Ireland Service that it expected to lose about 15 percent of its staff because some workers are unwilling to cross the river to commute to work in a predominately Protestant area. To help workers get over what the company representatives called this "psychological challenge," Perfecseal held employee discussion forums and talks with Amicus, the trade union that represents the majority of the staff.

Compliance with NI fair employment law and Code of Practice: Company practices generally appear consistent with the Code of Practice. Perfecseal's equal opportunity policy places responsibility for successful application of the policy with management at all levels, endorses the merit principle, safeguards employees against any form of harassment and subjects employees to disciplinary action for failure to adhere to the policy. The general manager of the Northern Ireland facility has overall responsibility for equal employment.

The company advertises openings on the Internet, in local papers read by both communities, and in the Belfast Telegraph and in job markets, using an EEO statement. Perfecseal always notifies all employees of positions open to internal applicants, and publicly advertises the majority of job openings, with the exception of jobs filled using recruitment agencies. It always uses a panel to interview job candidates, and both communities are represented where possible. The company provides all employees with equal opportunity training; some employees receive interview training. Perfecseal reviews the background of its applicants to determine success rates by community.

Underrepresentation analysis: Protestants have been underrepresented at the company for a number of years when compared to plausible weighted catchment areas that consider different areas for varying job categories. The Northern Ireland Service considers all of Northern Ireland an appropriate catchment area for managerial, professional, skilled workers and sales employees and the Londonderry travel-to-work area for associate professionals, administrative staff, machine operatives and elementary occupations.

Plant and machine operatives represent more than half of the work force and Protestants appear to be clearly underrepresented in this employment category. Protestants also appear to be specifically

underrepresented among the elementary job category, associate professionals, sales associates and overall.

Perfecseal has grown rapidly in recent years and the somewhat high Catholic numbers may reflect the influence of the relatively larger number of Catholics among younger working-age people in Derry. Even so, Protestant underrepresentation persists in the plant and machine operatives job category and at the company overall when the large numbers of Catholics among young people are taken into account. The 2001 census data for youth showed a make-up of 72.3 percent Catholic for the Londonderry travel-to-work area. The skill level of the work force is increasing and entry-level requirements are becoming more stringent, making it necessary for better qualifications that may not exist for all among this group of potential applicants. New employees ideally must have two years experience (though not necessarily recent experience) in a manufacturing environment and secondary school qualifications in math and English. The company also uses a psychometric test that can qualify applicants who do not have these qualifications.

The proportion of Protestant applicants has risen significantly in recent years, from an average of 15 percent from 2000 through 2004 (except in 2003, when their proportion dropped to 7.3 percent) to an average of slightly under 20 percent in the three most recent monitoring periods. The company told the Northern Ireland Service that it attributed the dip in Protestant applicants in 2003 to the sharp increase of unemployed Catholics entering the job market after several textile plants closed in the area. Protestants appear to be underrepresented among applicants overall and in several job categories. Among new hires, they do not appear to be underrepresented. In the most recent monitoring period, 29 percent of new hires were Protestant--an average amount over recent years (22 percent in 2008, 34 percent in 2006, 12.5 percent in 2005 and 21 percent in 2004).

The company last had redundancies in 2000, when it let go just two people. It has developed a redundancy matrix that includes a range of factors that consider skill, discipline records and other factors in redundancy selection.

Conformance with MacBride principles: Perfecseal says its operations adhere to the MacBride principles "where it is practicable and reasonable to do so." Bemis reached an agreement with shareholder proponents of the MacBride principles in 1997.

Affirmative action outreach - Perfecseal's affirmative action plan, adopted in 1998, includes specific goals for increasing the percentage of Protestant applicants and appointees to 17 percent in each year for manual grades. It also states "an overall (annual) goal of increasing the Protestant proportion of its work force to 28 percent."

Perfecseal reached its goal for Protestant applicants in the 2005 monitoring year of about 17 percent, although new hires fell far short of the target, with just 12.5 percent Protestant representation. It clearly has some way to go before it meets the goal of 28 percent Protestant representation overall.

The company includes a general welcoming statement in all advertisements and a statement particularly welcoming applications from the Protestant community in advertisements for general attendant positions. Perfecseal advertises in the job market in Limavady, a nearby town that is more heavily Protestant than Derry, and is developing links with schools, job agencies, training schemes and community groups that serve the Protestant community. It also uses trade magazines to draw applicants. The company also has met with underrepresented community leaders to see what steps can be taken to attract applicants. In addition, Perfecseal reviews progress with its affirmative action plan at leadership team meetings and conducts an annual audit of employment practices and procedures.

The company told the Northern Ireland Service in 2003 that it has had difficulty recruiting employees on the Protestant side of the Foyle River because of inadequate public transportation. The facility has two shifts. The first shift starts before buses begin operating, and the second shift ends after public transportation closes. The company notes that most employees either walk to work or take cabs from the immediate community surrounding the facility--an area that is heavily Catholic.

Grievances -Five grievances were filed against the company at the Fair Employment Tribunal in 2006 and conciliated in 2007. The company has a grievance policy that allows employees to file confidential complaints. It also enables employees to raise grievances with someone other than their direct supervisor, which could be an independent person of the same community background.

Black Box Corp.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	September 2004	Affirmative Action	No	FET Settlements	0

• Black Box Network Services

Location	Antrim		
Business	Voice, Data & Networking Infrastructure		
Employees	(Data as of 2009)		
	Protestant	12	70.00%
	Catholic	6	30.00%
	Other	0	
	<u>Total</u>	<u>18</u>	

2009 Survey Response: Full

Available information: Black Box Network Services offers technical network support and products throughout Ireland and Northern Ireland. It acquired EDC Communications in Northern Ireland in July 2002. The company has on-site installation offices in Antrim, as well as in Dublin. Black Box responded to the Northern Ireland Service survey in 2008 for the first time since 2005, and again in 2009.

Compliance with NI fair employment law and Code of Practice: The company maintained all what it has declared in the earlier 2008 survey its policies conform to the standards and requirements of Northern Ireland's fair employment law and code of practice. All available positions are publicly advertised at government job markets, in all three of Belfast's daily newspapers as well as local and regional newspapers. Employees are notified of positions open to internal applicants and advertisements include an EEO statement.

Black Box appears to conform to good recruitment practices, using a panel representing both communities to interview job candidates, giving staff involved in candidate selection EEO training, and reviewing the religious composition of applicant pools and new hires to determine success rates by community. The company has provided workshops and training to all employees on how to address potential sectarian harassment and intimidation in the workplace, using information from the Equality Commission. Black Box provided the Northern Ireland Service with the detailed procedural manual it uses for recruitment.

Black Box's pledge to ensure equality in the workplace as detailed in its fair employment and equal opportunities statement is comprehensive and extends much farther than most of the other companies of this size that the Northern Ireland Service has reviewed. In an uncommon gesture it says it is committed to "securing fair participation for Catholics and Protestants" and well as "promoting a harmonious working environment where no form of intimidation or harassment will be tolerated."

Black Box also provided the Northern Ireland Service with copies of its detailed and its redundancy policy, which aims to ensure fairness and transparency.

Senior managers in Northern Ireland, UK management, the corporate headquarters and the corporate board oversee the company's equality policy.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. Nevertheless, both communities appear to be fairly represented at the company overall. While Managers (Standard Occupation Classification - SOC 1) are 100 percent Catholics, whereas Protestants account for three quarters of the Skilled trades (SOC 5). The company made no new hires and registered one redundancy (one Protestant worker) in the most recent monitoring period. The current community representation is available in the table above, updated and based on the company's 2009 survey response.

Conformance with MacBride principles: The company says that its policies and practices reflect the standards embodied in the MacBride principles.

Affirmative action outreach - No affirmative action appears warranted given the company's balanced work force breakdown. Black Box notes in its fair employment and equal opportunities statement its commitment to "taking positive actions such as setting goals and timetables." The company's general manager has attended workshops provided by the Equality Commission to ensure his knowledge of the issues surrounding equal opportunities. The company holds "continuous improvement" meetings, which the company says, "allows the managers to be positive role models and convey information on business issues and reinforce the need to celebrate differences."

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal as of August 2009. In 2008,the company provided the Northern Ireland Service with a copy of its policy, which appears to reflect standard practices, including allowing complaints to be filed confidentially.

Blackstone Group

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	September 2007	Affirmative Action	No	FET Settlements	0

• Hilton Belfast

Location	Belfast		
Business	Hotels		
Employees	(Data as of 2007)		
	Protestant	48	50.00%
	Catholic	51	50.00%
	Other	25	
	<u>Total</u>	124	

2009 Survey Response: None

Available information: Hilton, now partially owned by Blackstone Group, is a major operator of both hotels and betting shops. It manages hotels in more than 65 countries and runs some 2,500 betting shops around the United Kingdom and Ireland. Hilton Belfast won the Hilton Group's 2004 quality hotel of the year award. Previously, the company has responded in detail to the Northern Ireland Service surveys, although its 2008 Survey Response did not include complete employment data.

Compliance with NI fair employment law and Code of Practice: Hilton Group has an equal opportunities policy, which it regularly reviews and updates. The company publicly advertises all job openings, using the Belfast Telegraph and government job markets. When selecting candidates for employment, the company always uses a panel of multiple interviewers, ensuring that both communities are represented on the panel where possible. All staff involved in candidate selection have received training on equal employment issues, and Hilton always reviews the religious composition of applicant pools and new hires to determine success rates by community. When selecting employees for redundancy, Hilton says that it consults the Equality Commission to ensure that its layoffs do not disproportionately affect one group. The company has also consulted with employee representatives on fair employment and harassment issues. Northern Ireland senior management are responsible for overseeing EEO and affirmative action efforts.

Underrepresentation analysis: Protestants appear to be underrepresented at Hilton Belfast when the work force is compared to two weighted catchment areas, the Belfast travel-to-work area and all of Northern Ireland. They appear to be underrepresented overall and specifically at the managerial level, associate professionals and among personal service workers. The Protestant portion of the work force has fluctuated over the last five years, reaching a high of 54 percent in 2005.

Conformance with MacBride principles: The company said its policies reflect the fair employment principles embodied in the MacBride principles, and it responds to the Northern Ireland Service surveys.

Affirmative action outreach - Hilton Belfast recognizes that Protestants are underrepresented in its work force and it uses EEO statements in its ads, job markets in particular areas and other methods to boost applications from that community. Like many companies, it does not have a formal affirmative action plan, nor has it entered into an agreement with the Equality Commission to set goals and timetables for the recruitment of Protestants.

Grievances -No complaints appear to have been filed against the company at the Fair Employment Tribunal as of August 2009.

Blackstone Group

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	September 2007	Affirmative Action	No	FET Settlements	0

• Hilton Group PLC t/a Hilton Templepatrick

Location	Templepatrick		
Business	Hotels		
Employees	(Data as of 2007)		
	Protestant	91	80.00%
	Catholic	22	20.00%
	Other	10	
	<u>Total</u>	<u>123</u>	

2009 Survey Response: None

Available information: See Hilton Belfast profile.

Compliance with NI fair employment law and Code of Practice: See Hilton Belfast profile.

Underrepresentation analysis: Catholics appear to be underrepresented in the work force at Hilton Templepatrick when the work force is compared to a weighted catchment area that compares managers to Northern Ireland (42.7 percent Catholic), sales staff to the local Antrim district council area (38.8 percent Catholic), and all other workers to the wider Belfast travel-to-work area (33.3 percent Catholic). Within specific job categories, Catholics appear to be underrepresented among personal service workers, miscellaneous low-level employees and overall at the company; the catchment area weighted by job category is about 40 percent Catholic, compared to the hotel's 19.5 percent representation.

The Hilton Templepatrick is located along a major motorway, which should make it easily accessible. But Templepatrick itself is heavily Protestant. The area probably poses a chill factor to Catholics, who only accounted for only 14 percent of the population of the Templepatrick electoral ward in 2001. This ward has grown substantially more Catholic in the last ten years, however; in 1991, Catholics made up only 4 percent of its population.

Conformance with MacBride principles: See Hilton Belfast profile.

Affirmative action outreach - Hilton Templepatrick has agreed that Catholics are underrepresented, but it has not entered into a formal affirmative action agreement with the Equality Commission. The company has told the Northern Ireland Service it uses job markets in Catholic areas, puts an EEO statement in its job ads and has made special efforts to recruit from the unemployed to boost the number of Catholic applicants.

Grievances -No complaints appear to have been filed against the company at the Fair Employment Tribunal as of August 2009.

Blockbuster

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	December 1998	Affirmative Action	Yes	FET Settlements	0

• Xtra-Vision

Location	46 stores province-wide		
Business	Video tape rentals		
Employees	(Data as of 2007)		
	Protestant	172	50.00%
	Catholic	166	50.00%
	Other	0	
	<u>Total</u>	<u>338</u>	

2009 Survey Response: None

Available information: Blockbuster acquired the Xtra-Vision chain of video rental stores in Northern Ireland in 1996. The 46 stores currently operating according to the company Web site as of December 2009, are located throughout the province and give the company a presence in areas where there are no other U.S. firms. Aside from the primary business of video rentals, Xtra-vision also sells mobile phones, games and other electronic products. Eleven stores are in Belfast, spread fairly evenly around the city in both Catholic and Protestant areas; the remainder are spread across Northern Ireland. Each store employs between four and 11 workers.

Compliance with NI fair employment law and Code of Practice: The company says its operations adhere to fair employment law and the Code of Practice, and that it monitors work force data "for internal purposes" as the information is useful to the company's (and industry's) ongoing recruitment efforts. In 1999, it reported that the fair employment law changes in 1998 "set a model of best practice which the company already conforms to." In 2001, following a review of its practices, the company adopted new equal opportunity and anti-harassment policies. All employees receive training on the new policies.

The company publicly advertises all job openings and notifies all employees of positions open to internal applicants. It uses the Belfast Telegraph, local newspapers, job markets, government job centers (including the Training and Employment Agency of Northern Ireland), local job clubs, the Internet and the employee intranet to publicize its vacancies. Blockbuster uses panels to interview candidates but does not ensure that both communities are represented on them. All interviewers are trained on equal employment issues and the religious composition of applicants are reviewed to ensure no bias has crept into the selection process. Promotions are treated in the same way as other vacancies. The company said that it no longer uses seniority to select employees for upper level jobs so as to ensure equitable treatment for both community groups. Training "is open and offered to all levels regularly"; the company is not participating in any affirmative action outreach efforts involving training, but no such efforts seem warranted.

Employees elect members of an employee relations committee to facilitate discussion and consultation with elected representatives on all issues, including equality of employment. Overall responsibility for equal employment issues lies with the senior vice president/managing director of the company. The director of human resources has line responsibility.

Underrepresentation analysis: Protestants appear to be slightly underrepresented, particularly in the sales group, which makes up 96 percent of the work force. Since the company has stores province-wide, all of Northern Ireland is an appropriate catchment area for all job categories.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation with New York City in late 1998, after investors withdrew a 1999 shareholder resolution asking Viacom, Blockbuster's then-parent, to implement the MacBride principles. The company says it will "continue to make lawful efforts to implement the fair employment principles embodied in the MacBride principles."

Affirmative action outreach - The company takes pains to advertise in papers read by both communities. It includes EEO statements in its ads and also uses statements particularly welcoming specific underrepresented groups "in areas where analysis of previous recruitment exercises demonstrates an underrepresentation of applications received from a specific group and therefore warrants the use of such a statement in future recruitment exercises." In its 2000 survey response the company noted, "Whilst the composition of the work force closely reflects the population of Northern Ireland as a whole we continue to promote equality of opportunity at work and will take action where appropriate."

Grievances -No fair employment grievances have been filed against the company in recent years, as of August 2009.

Borland Software

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	April 2008	Affirmative Action	No	FET Settlements	0

• Borland (UK)

Location	Belfast		
Business	Technical support center		
Employees	(Data as of 2008)		
	Protestant	12	40.00%
	Catholic	15	60.00%
	Other	6	
	<u>Total</u>	<u>33</u>	

2009 Survey Response: None

Available information: Borland Software agreed in the spring of 2008 to comply with the MacBride principles in response to a shareholder resolution.

Compliance with NI fair employment law and Code of Practice: Borland Software has asserted that it adheres to fair employment law in Northern Ireland and complies with the MacBride principles. The company advertises job openings in the Belfast Telegraph but not in two other Belfast-based daily papers. Both communities are represented on its interview panels, and those involved in candidate selection sometimes receive training on equal employment issues.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees with identified religion. However, both communities appear to be fairly represented at the company when the work force is compared to all of Northern Ireland or the Belfast travel-to-work area. The proportion of Catholic and Protestant employees has held steady for the past several years.

Conformance with MacBride principles: Borland Software agreed in the spring of 2008 to comply with the MacBride principles in response to a shareholder resolution.

Affirmative action outreach - No affirmative action appears necessary.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

Carlson Cos. Inc.

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	1

• Radisson Roe Park Hotel & Golf Resort

Location	Limavady and Belfast		
Business	Golf course, driving range, club house and hotel		
Employees	(Data as of 2007)		
	Protestant	87	50.00%
	Catholic	78	50.00%
	Other	17	
	<u>Total</u>	<u>182</u>	

2009 Survey Response: None

Available information: Privately held Carlson owns Radisson Hotels and Resorts, which owns and franchises hotels worldwide from its headquarters in Minnesota. The Northern Ireland operation is run by a local company that holds the franchise through a relationship with Belgium-based Rezidor Hospitality, which in turn has a license for operating Radisson businesses in Europe. Carlson's connection to the Northern Ireland operation is therefore relatively indirect. In addition to the resort in Limavady, a large Radisson hotel opened in downtown Belfast in 2004 and Rezidor opened a Park Inn in Newry in March 2006.

Compliance with NI fair employment law and Code of Practice: No information is available on Radisson's fair employment practices in Northern Ireland, other than press reports that indicate the company has updated its policies. The company's equal opportunity policy states that Carlson is an equal opportunity employer that respects all facets of diversity, including ethnic origin, gender, age, sexual orientation, and work and life experiences, therefore not including either religion or political opinion.

Underrepresentation analysis: No group is underrepresented when the company's work force is compared to the working population of Northern Ireland as a whole, which is almost 43 percent Catholic. This is likely the best comparison given the company's various locations. More information from the company on its work force breakdown by job category would help refine this analysis.

Conformance with MacBride principles: The company has no agreement on compliance with the MacBride principles. As a private company, it has not received any shareholder proposals on this subject, which is the typical route to compliance.

Affirmative action outreach - No information is available about any affirmative action measures the company may be taking, but none appear warranted.

Grievances -The Radisson Roe Park Hotel settled a FET complaint against the hotel's barman who engaged in sectarian name calling against a customer, Theresa Murray. The incident occurred in June 2004 when the woman was visiting Belfast for the weekend with her daughter. According to press reports, "The hotel has agreed to review its practices and procedures to ensure they fully comply with the law, particularly in relation to the provision of goods, facilities and services and their complaints procedure for people who feel they have been discriminated against." The hotel's general manager told the press, "Equality training has become an integral part of in-house personnel procedures" and said the company worked with the Equality Commission to review its policies and procedures.

Caterpillar

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	February 2009	Affirmative Action	Yes	FET Settlements	0

• Wilson F.G. (Engineering)

Location	Larne, Newtownabbey, Belfast		
Business	Manufacture of diesel generators		
Employees	(Data as of 2009)		
	Protestant	1541	70.00%
	Catholic	691	30.00%
	Other	153	
	Total	2385	

2009 Survey Response: Full

Available information: Caterpillar consistently provides a full response to the Northern Ireland Service survey. Service staff met with F.G. Wilson management in Northern Ireland in 2008, 2006 and 2003. F.G. Wilson continues to be the largest publicly held U.S. employer in Northern Ireland. The company now employs approximately twice the number of workers that it did ten years ago. F.G. Wilson has four sites: a main manufacturing facility in Larne, two smaller facilities in West Belfast (Springvale) and Newtownabbey and an office in Belfast. F.G. Wilson provided the Northern Ireland Service with specific information on employees at each site in 2009. The company's expansion in Northern Ireland has been underwritten by government funding but has also involved substantial capital expenditures on the company's part.

Compliance with NI fair employment law and Code of Practice: The company has described its fair employment policies in its survey response and provided extensive supporting documentation. Its EEO policy has a comprehensive anti-discrimination statement and notes that to ensure its effectiveness, the company has consulted with employees about the policy and communicated its details to all workers. The procedures described in the policy appear to follow the requirements of Northern Ireland fair employment law and Code of Practice, and the recommendations of the Equality Commission.

The company has two sets of recruitment procedures for temporary and permanent vacancies. For temporary workers, who are paid an hourly rate, Caterpillar relies on an outside agency to screen applicants. The agency shortlists candidates and arranges interviews. For permanent positions, an outside agency may conduct the job advertising, but Caterpillar shortlists the candidates and asks the agency to arrange the interview. Caterpillar conducts all the interviewing for both types of positions, except in rare occasions when the agency conducts them for temporary workers.

Caterpillar notes that all F.G. Wilson employees are notified of positions open to internal applicants and that it often advertises permanent vacancies widely in Northern Ireland newspapers read by both communities, such as the Belfasts Telegraph, internet, and radio. During the selection process, the company always uses an interview panel. It does not ensure cross-community representation on the panels because to do so would be "impracticable and inappropriate," according to the company.

F. G. Wilson reviews the religious composition of applicant and new hire pools to determine success rates by community as part of its annual and triennial submission for the Equality Commission. This can be a useful check to ensure selection procedures are not biased.

F.G. Wilson has agreed to a redundancy procedure with its unions that it says "provides for the application of measures that do not have a disproportionate effect on any one group, nor do they undermine affirmative action achievements." The company's senior management based in Northern Ireland has direct responsibility for overseeing fair employment matters at F.G. Wilson. The company recognized trade unions at its facilities in September 2001, after being a non-union shop for many years. F.G. Wilson's managers have had occasional discussions with employee representatives about equal opportunities. As far as redundancies were concerned, 62 percent of last year's redundancies regarded Protestant employees, whereas 27 percent of this figure concerned Catholic employees.

Underrepresentation analysis: Since the last monitoring period, the Catholic proportion of F.G. Wilson's work force has confirmed the previous survey's trend, rising up until 31 percent. It had been around 28 percent for five years at the end of the 1990s and the beginning of this decade, up from under 21 percent ten years before. Despite the company's substantial progress towards a work force that is more representative of the local population, both Catholic and Protestant underrepresentations at the company still exist, although for sake of clarity this regards especially Catholics. Out of the four company facilities in Northern Ireland, Catholics are heavily underrepresented at the Larne, Newtownabbey, and Belfast offices, whereas Protestants are underrepresented (although not so heavily) at the Springvale plant in West Belfast (where out of the eight Managers in SOC1, five are Protestants and three are Catholics). This underrepresentation analysis is visible especially at the SOC5 skilled trades and in the Newtownabbey facility (where Protestants are overrepresented than Catholics by 218 to 30 and 332 to 47, respectively). In the most recent monitoring period, Catholics are underrepresented in every employment category at the company and overall, although Protestants are underrepresented at the company's Belfast facility. However, looking aggregately at the company workforce, this has decreased 10.7 percent since last monitoring period, and redundancies affected Catholics (minus 4.7 percent with respect to last period) than Protestants (minus 11.8 percent), whereas the greatest impact of the workforce contraction was mainly suffered from non affiliated employees, who decreased by 15.5 percent with respect to 2008.

The company considered all of Northern Ireland as the appropriate recruitment area for managers, professionals, skilled workers and sales associates and a smaller area for administrative staff, associate professionals, plant and machine operatives and elementary occupations. These latter occupations were compared to the population in the three district council areas in which the company operates-- Larne, Newtownabbey and Belfast--whose regional populations are 25, 21 and 33 percent Catholic, respectively. Catholics are significantly underrepresented at the company's Larne and Newtownabbey facilities, and overrepresented in Belfast.

Catholic representation among applicants and new hires rose significantly in 2008 to 43 up from less than 30 percent in the most recent monitoring period and its zenith of 39 percent in 2004. In 2009, Catholic new hires declined again, representing the 39 percent of all applicants (53 percent were Protestants). On the other hand, 49 percent of the applicants was Protestants and 36 percent was Catholic, showing how both Catholic and Protestant representation rate grew from applicants to new hires, whereas non affiliated representation dropped (14 percent of all applicants are not affiliated to either religious belonging, but only 7 percent of new hires is neither Catholic or Protestant) as much as it did on the total workforce (as reminded, minus 15.5 percent with respect to the previous monitoring period).

Conformance with MacBride principles: Caterpillar reached an agreement on implementation of the MacBride principles and cooperation with monitoring by the Northern Ireland Service in early 2002, prompting the withdrawal of a shareholder resolution on the subject from the New York City pension funds. Emerson Electric had reached a similar agreement shortly before it sold its stake in F.G. Wilson to Caterpillar several years ago.

Affirmative action outreach - F.G. Wilson told the Northern Ireland Service that it the Equality Commission has not felt it necessary to set any affirmative action goals or timetables for the company. However, it carries out "outreach programmes" to both communities to encourage more applicants and promote the Company as an Equal Opportunities Employer.

Grievances - Since 2004, six complaints have been filed against the company at the Fair Employment Tribunal until August 2009. Three were dismissed, two conciliated and one remains pending.

F.G. Wilson's grievance policy allows employees to file confidential complaints and to raise issues with someone other than a immediate supervisor, including someone of the same community background. In its most recent survey response, the company noted, "If possible/ practicable, complaints will be dealt with by someone with an affinity to the person's background."

CB Richard Ellis

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

• CB Richard Ellis

Location	Belfast
Business	Commercial Property Consultants
Employees	(Data as of June 2007)
	Total 11

2009 Survey Response: None

Available information: CB Richard Ellis is a leading advisor on the commercial real estate market. It has offices in Belfast. In the most recent monitoring period, the number of employees grew from nine--two short of the monitoring threshold set by the Equality Commission--to over 10, meaning that it is now subject to Equality Commission monitoring. Because the number of employees is below 26, however, detailed data is not included in the Commission's annual monitoring report.

The company submitted a full response to the 2006 Northern Ireland Service survey and reported that its policies adhere to fair employment laws. In its 2006 survey response, CB Richard Ellis reported that it is compliant with the MacBride principles, but not willing to complete the annual survey; the company did not respond to the Northern Ireland Service's surveys since 2007. No fair employment grievances have been filed against the company.

Underrepresentation analysis: The Northern Ireland Service does not assess the demographics of workplaces with fewer than 30 employees.

CBS

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	December 2006	Affirmative Action	No	FET Settlements	0

• CBS Outdoor

Location	Belfast
Business	Advertising
Employees	(Data as of Nov. 2009)
	Total 12

2009 Survey Response: Full

Available information: CBS Outdoor Ltd. (an English registered company) is a subsidiary of CBS Corporation and displays advertising on out-of-home media, including billboards, transit shelters, buses and rail systems.

CBS Corporation communicated in a letter to RiskMetrics that it "is taking all lawful measures in good faith to comply with the fair employment standards embodied in the MacBride principles and the fair employment requirements of Northern Ireland." CBS Outdoor has a total of 12 workers in a branch office in Northern Ireland. The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. No fair employment grievances have been filed against the company.

Another CBS subsidiary, ABC Outdoor (A Northern Ireland registered company) is currently dormant. CBS has regularly responded to the Northern Ireland Service's surveys, although partially in 2009.

Chesapeake

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	January 2001	Affirmative Action	Yes	FET Settlements	0

• Field Boxmore Belfast Ltd

Location	Newtownabbey		
Business	Carton manufacture		
Employees	(Data as of 2007)		
	Protestant	137	80.00%
	Catholic	33	20.00%
	Other	3	
	<u>Total</u>	<u>173</u>	

2009 Survey Response: None

Available information: Chesapeake Corp. bought the Northern Ireland specialty packaging firm of Boxmore International in 2000. Boxmore was a family-run packaging company that went public in 1989, with several operations in Northern Ireland. Boxmore Plastics operation in Lurgan, part of the plastics division of Chesapeake Corp. was sold as a management buy out in March 2006. Chesapeake has retained a specialty packaging and merchandising business, Field Boxmore Healthcare Packaging, located in Newtownabbey. The company has regularly responded to Northern Ireland Service survey, although it did not respond in 2007 or 2008. Company officials met with Northern Ireland Service staff in Northern Ireland in 2001. Employment at the company has remained relatively steady for the last four years.

Compliance with NI fair employment law and Code of Practice: The company's policies adhere to the standards established by Northern Ireland fair employment law and the Code of Practice. All job openings are publicly advertised and are made available to staff through postings on noticeboards. When advertising externally, the company uses various media and publications that are accessible to both communities, including the Belfast Telegraph, other local and regional newspapers, the Irish Times, government job markets, recruitment agencies and the Internet.

Field Boxmore always uses a panel of interviewers when selecting candidates, and tries to ensure cross-community representation where possible. All employees involved in candidate selection have received EEO training, and the company always reviews the religious composition of applicant pools and new hires to determine success rates by community. To address potential sectarianism or harassment in the workplace, Field Boxmore provides training for all employees using materials from the Equality Commission and its own documents. In its survey response, the company noted: "We are in regular contact with the Equality Commission and complete the annual & triennial returns and participate in the reviews." The company has completed four triennial policy reviews, the most recent submitted in 2995 for the period 2001 through 2004. It reports that it has discussed its redundancy procedures with the trade union, employee representatives, the Equality Commission and the Labor Relations Agency.

Underrepresentation analysis: Catholics appear to be underrepresented in at the company; they comprise less than one-fifth of the work force--a proportion that fell in the 2007 monitoring period from approximately one-fourth. Catholics make-up 42.7 percent of the available labor pool for Northern Ireland and 33 percent for the Belfast travel-to-work area. The company's specific location is in a Protestant area where Catholics make-up about 21 percent of the labor pool, but the Equality Commission says companies should be able to recruit from an area wider than their immediate neighborhood. The ideal Catholic representation would fall between 30 and 35 percent. A more precise estimate is not possible unless the company provides a breakdown of its work force by job category.

Conformance with MacBride principles: In January 2001, the company reached an agreement on MacBride implementation with the New York City Comptroller's office. The comptroller's office then withdrew a shareholder resolution on the subject. The company's general counsel said Chesapeake "has a long-standing policy of being an equal opportunity employer," and that this policy applies to all

the Boxmore operations in Northern Ireland. Chesapeake said it will "take all lawful steps to observe the MacBride principles to the extent they are applicable to our operations in Northern Ireland," and that it would cooperate with monitoring by the Northern Ireland Service.

Affirmative action outreach - The company has not defined any goals or timetables with its outreach measures, however it includes EEO statements in its ads, conducts school outreach programs and aims to reach both communities with its job advertisements. Field Boxmore reports, it "will continue to monitor its composition of employees and where necessary will use measures to attract members of any under-represented community." The company also reported that it works with schools in both communities, sponsoring work experience programs and inviting students to visit its facility.

Grievances -No fair employment grievances have been filed against the company in recent years.

Clear Channel Outdoor Holdings

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	January 2006	Affirmative Action	No	FET Settlements	0

• Clear Channel NI

Location	Belfast		
Business	Advertising		
Employees	(Data as of August 2008)		
	Protestant	14	70.00%
	Catholic	6	30.00%
	Other	1	
	Total	21	

2009 Survey Response: None

Available information: The company has a small office in Belfast with 21 employees, working in Clear Channel's advertising business.

Compliance with NI fair employment law and Code of Practice: The company says its policies and practices conform to Northern Ireland fair employment law and the Code of Practice. It says that all job openings are publicly advertised, and that all employees are notified of openings. Clear Channel uses the Belfast Telegraph for ads, along with its intranet and recruitment agencies. The company always uses a panel with more than one person to interview job candidates, sometimes is able to ensure cross-community representation on panels, but has not trained employees involved in candidate selection on EEO issues--something that fair employment experts would consider advisable. The company does, however, review the religious composition of its applicant and new hire pools to determine community success rates, which can flag problems in recruitment procedures. The company says it uses its company handbook policies and employment contracts to ensure its workplace remains free of sectarianism.

Underrepresentation analysis: Analyzed using a catchment area defined as the Belfast travel-to-work area, which is 33 percent Catholic, no group appears to be underrepresented at the company.

Conformance with MacBride principles: The company has regularly indicated in survey responses that its policies conform with the MacBride principles and it agreed to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach - No affirmative action appears warranted.

Grievances -No fair employment grievances have been filed against the company as of August 2009.

Coca-Cola Co.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	2
Agreement Date	September 2004	Affirmative Action	No	FET Settlements	2

• Coca-Cola Bottlers (Ulster) Ltd.

Location	Lirburn, Omagh		
Business	Manufacture, Sales and Distribution of soft drinks		
Employees	(Data as of 2009)		
	Protestant	430	60.00%
	Catholic	257	40.00%
	Other	53	
	<u>Total</u>	<u>740</u>	

2009 Survey Response: Full

Available information: The company has responded in full to the Northern Ireland Service survey for the last few years. Service staff met with company representatives in 2005. Coca-Cola owned what it termed a "non-controlling ownership interest" in Coca-Cola HBC of Greece, the immediate parent of the bottling company in Northern Ireland. Coca-Cola Bottlers (Ulster) Ltd. has bottled Coca-Cola beverages for many years, but Coca-Cola's relationship with Coca-Cola HBC was less direct until 2000 when it acquired a 24 percent stake in the bottling company. Coca-Cola Bottlers plans to combine all its operations on the island of Ireland into a new facility located at Knockmore Hill in Lisburn. Northern Ireland politicians have worked closely with the company throughout the selection process for the new site. Coca-Cola Bottlers reported, "all the main political parties made representations to the company to offer support and assistance in maintaining employment within the Lisburn area." The positive impact restructuring will have on job creation is enhanced by the company's decision to build the new facility only about five miles away from the former site. Workers in the Republic of Ireland, on the other hand, are likely to face redundancies when their facilities close.

Coca-Cola's primary business is the manufacture and sales of beverage concentrates and syrups, which it sells to more than 300 bottling companies with which Coke has business relationships. Coca-Cola HBC's policies, management and governance structure are separate from Coca-Cola's, although the two "work together to find common ground and take common action in many areas," a Coca-Cola representative said.

Compliance with NI fair employment law and Code of Practice: The company says its operations adhere to the standards of the Northern Ireland fair employment law and Code of Practice. It has provided the Northern Ireland Service with a copy of its employee handbook, which describes the company's EEO and harassment policies in detail.

In its 2009 survey response, the company said most jobs are often publicly advertised, although in its previous response also mentioned it uses an internal promotion track to move up sales employees to higher positions and generally hires internally when filling more senior sales posts. All employees are notified about positions open to internal candidates. Job ads are placed in the Belfast Telegraph, other local newspapers, and trade publications, job markets and through recruitment agencies company notice boards. In December 2004, Coca-Cola HBC conducted a major advertising campaign in Northern Ireland and the Republic of Ireland through the Belfast Telegraph and the Irish Times.

Coca-Cola HBC reported in its 2009 response that it always examines the religious composition of applicants and new hires, which can be a useful check to ensure no bias has crept into the selection process. It uses the same process for promotions. Moreover, in its previous response, it stated to use more than one person to interview job candidates, to sometimes ensure both communities are represented on the panel, and to always ensure interviewers have received EEO training. Training is open to all employees and needs are determined on a company-wide basis. Other employee training requests are considered "based on the capability requirements of the organization."

Employees receive EEO and harassment training, which outlines their "personal responsibility as employees and the consequences of non-compliance." The company says it manages all redundancies

"according to the specific circumstances," and that there are "no blanket rules for all occasions," although it never makes employees redundant on a last in-first out basis. All redundancies are managed in concert with the company's trade union.

The Equal Opportunities Policy and Preventing and Eliminating Workplace Harassment Policy and Procedures are the responsibility of the local Managing Director and managed by the Human Resources function. The local board of directors monitors compliance and receives reports on these policies and their implementation. Management occasionally consults with trade unions about internal policy changes and procedures.

Underrepresentation analysis: While both communities appear to be fairly represented overall at the company's operations in Lisburn (where the majority of employees work), Protestants are underrepresented among the professional (SOC3) and administrative (SOC4) job classes, which make up over a fifth of all positions, and Managers (SOC1) are in majority Catholics (37 versus 33 Protestants). Moreover, at the Omagh facility (a warehouse and delivery depot, which has 19 employees), Catholics are thrice as Protestants (15 employees to 5). Coca-Cola reported in previous survey responses that nearly 60 percent of its workers live in the Belfast travel-to-work area; the rest live throughout Northern Ireland. In the latest monitoring period, the company received 730 applications (almost equally distributed between 327 Protestants and 308 Catholics), whereof Catholics applied in greater amount for SOC1 and SOC3 positions. These resulted in 153 new hires (77 Protestants and 57 Catholics), where the only Catholic greater representation is registered within the SOC1. As far as redundancies are concerned in the latest monitoring period, Coca-Cola reported that Protestant redundancies (mainly in SOC8 – Process, Plant & Machine Operatives) were thrice the Catholic.

Conformance with MacBride principles: In September 2004, Coca-Cola wrote to New York City Comptroller William Thompson and said that the company "is committed to fostering a diverse work force throughout our worldwide operations," and that this commitment "is integral to our corporate identity and to our ability to thrive." It says it has "benefited from the various cultural insights and perspectives of the societies in which we do business," and that the company's "future success will depend on our ability to develop a worldwide team that is rich in its diversity of peoples, cultures and ideas." Coca-Cola said it is "committed to take lawful steps in good faith to conduct business in Northern Ireland in accordance with the fair employment standards embodied in the MacBride principles applicable to our particular situation" with its non-controlling ownership stake in Coca-Cola HBC. In a report released in 2006, New York City Comptroller William C. Thompson, Jr., said as Coca-Cola agreed to urge franchise holders in Northern Ireland to implement the Principles and adhere to fair employment standards to foster a diverse workforce. Coca-Cola also promised to comply with monitoring by the Northern Ireland Service. In its most recent survey response, the company reported that "Compliance [with the MacBride Principle] is monitored and reported at local board meetings to the Directors of the Company".

Affirmative action outreach - No affirmative action measures appear warranted overall at the company. Coca-Cola said that it maintains fair representation through regular monitoring and that "affirmative action would be taken in the event of an imbalance." The company puts an EEO statement in its ads and has used job markets in particular areas. It says the Equality Commission has not raised any concerns about underrepresented groups. Coca-Cola Bottlers says that "representation in management and professional posts is continuously monitored to ensure balance" and that balance is also ensured in the other categories. It notes that Catholics hold roughly half of the management and professional posts.

Grievances -In the last two years, two separate complaints were filed by the same plaintiff before the FET, on Aug. 22, 2008, and Nov. 18, 2009; both claims were withdrawn after settlement on May 14, 2009. The head of the Human Resources department believes the company may have settled cases in the past to save time and money, but said she would discourage this approach if an incident occurred in the future. The company's grievance policy allows for employees to file confidential complaints and to bring issues to someone other than their immediate supervisor, including a colleague who shares the same community background.

Columbus McKinnon Corp.

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

• CM Engineering (also known as Yale Northern Ireland)

Location	Belfast
Business	Design & manufacture of special purpose machines
Employees	(Data as of 2007)
	Total 25

2009 Survey Response: None

Available information: CM Engineering prepares engines for motorcycle racing teams participating in British and World Championships. According to the company Web site, it cannot make its location public, "due to the sensitive nature of our business," but the Columbus McKinnon website lists an operation in Belfast, Northern Ireland. It has a Northern Ireland- dedicated Web site but does not disclose any EEO/diversity policies or information regarding its labor force in NI. The company has not responded to the Northern Ireland Service's 2009 survey. The company is listed on the Equality Commission records, but it has no listing in the primary public directory for Northern Ireland. Columbus McKinnon has not responded to inquiries for information from the Northern Ireland Service. No information about fair employment practices is available. The Northern Ireland Service is not aware of any affirmative action measures the company is taking. No fair employment grievances have been filed against the company.

Underrepresentation analysis: In 2007, CM Engineering was not listed in the Equality Commission's annual report, indicating that the company now employs fewer than 26 employees.

Computer Sciences

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	November 2003	Affirmative Action	No	FET Settlements	0

• CSC Computer Sciences

Location	Derry (2 sites), Ballymena, Newtownabbey		
Business	IT outsourcing		
Employees	(Data as of 2007)		
	Protestant	10	30.00%
	Catholic	20	70.00%
	Other	2	
	<u>Total</u>	<u>32</u>	

2009 Survey Response: None

Available information: CSC manages aerospace outsourcing contracts for a number of large U.S. defense contractors, including Raytheon, which it works with in Northern Ireland. Employment fell by nearly half in the 2007 monitoring period, falling from 60 to 32. The company provided complete responses to Northern Ireland Service surveys from 2003 through 2006, but did not respond in 2007 or 2008.

Compliance with NI fair employment law and Code of Practice: The company says that its operations adhere to Northern Ireland's fair employment law and Code of Practice. All jobs are publicly advertised, all employees are notified of positions open to internal applicants, and jobs are advertised via the Internet and through the company's website. CSC uses an interview panel with more than one person to screen applicants, and sometimes but not always is able to ensure cross-community representation on interview panels. Employees that are involved in candidate selection receive EEO training, and the company always reviews the religious composition of applicant pools and new hires to determine community success rates.

Underrepresentation analysis: Protestants appear to be underrepresented at CSC among professionals and overall when compared to all of Northern Ireland, an appropriate comparison since the catchment area for this employment category is usually the entire region. The company only employs two categories of workers, professionals, who account for nearly 85 percent of the work force and managers. CSC has said in the past that it does not agree with this assessment and believes a work force breakdown by site would show there is no underrepresentation. In the most recent monitoring period, the percentage of Protestants in the work force rose from 26 to 33 percent; during this same period the total number of employees fell by half.

CSC says it generally draws employees from three regions, Derry City Council, Ballymena Borough Council and the Belfast City Council, which corresponds with its three locations. The religious portion of these areas varies greatly; Derry is nearly 74 percent Catholic while Belfast is 49 percent. However, both managers and professionals are typically recruited from a catchment area including all of Northern Ireland, which is 42.7 percent Catholic. In a comparison of CSC workers to this catchment area, Catholics exceed the 42.7 percent mark and comprise 71.2 percent of the work force.

Conformance with MacBride principles: In response to the Northern Ireland Service surveys, CSC indicated that its policies currently reflect the fair employment standards embodied in the MacBride principles; the company also said that it was willing to respond in full to the Northern Ireland Service annual fair employment monitoring survey.

Affirmative action outreach - CSC in 2003 concluded that no affirmative action was warranted given its work force breakdown, although it appears there may be some overrepresentation of Catholics. CSC continues to hold this view, which is buttressed by its description of a catchment area that is more heavily Catholic than the Northern Ireland-only census figures suggest.

Grievances -No discrimination grievances have been filed against the company at the Fair Employment Tribunal as of August 2009. The company says that its standard grievance procedure

covers all types of issues, and "allows the employee to raise the grievance with the most appropriate manager."

Conexant Systems

MacBride Agreement	Awaiting company response	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

• Amphion Semiconductor

Location	Belfast
Business	Design and supply of digital signal processing
Employees	(Data as of 2007)
	Total 27

2009 Survey Response: None

Available information: Amphion Semiconductor, acquired by Conexant Systems in 2004, registered with the Equality Commission in 1998 and currently has 27 employees.

Underrepresentation analysis: Fewer than 10 of Amphion Semiconductor's 27 employees are Roman Catholic. The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. However, both communities are represented in the work force.

Conformance with MacBride principles: Conexant has not yet replied to the Northern Ireland Service's inquiries regarding its compliance with the MacBride principles.

Grievances -No fair employment grievances have been filed against the company as of August 2009.

Crane

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	Yes	FET Settlements	0

• Stockham Valve Ltd.

Location	Belfast		
Business	industrial check valves; oil field equipment		
Employees	(Data as of Feb. 2008)		
	Protestant	66	86.00%
	Catholic	11	14.00%
	Other	11	
	Total	88	

2009 Survey Response: None

Available information: Crane acquired portions of Stockham Valve, including that company's Belfast operations, in 1997. In 1999, Crane closed or downsized several European plants, and the Belfast facility has seen a significant decrease in its work force, which dropped from 154 employees in 1999 to 88 in 2006. Stockham Valve completed a full response to the 2008 Northern Ireland Service survey and provided copies of its policies.

Compliance with NI fair employment law and Code of Practice: The company reports that its policies are in line with fair employment laws in Northern Ireland. It informs its employees and publicly advertises job opportunities as they become available. Openings are advertised in the Belfast Telegraph, the Irish News, the Internet, the company intranet, through recruitment agencies and at job markets. When selecting candidates, the company uses an interview panel comprised of employees that have been trained in EEO issues and works to ensure that both communities are represented on these panels "as far as possible." Crane Stockham reviews the religious composition of its applicants to determine success rates by community and ensure the selection process is not biased. Promotion opportunities at the company are internally advertised and the company said, "normal recruitment procedures are followed with the selection made on merit only." Likewise, it reported that a set of criteria is considered when redundancies are necessary.

The company EEO policy includes specific reference to sectarian issues in Northern Ireland. One of the stated objectives in the policy is to, "monitor the outcome of our recruitment, selection, training and promotion procedures and the composition of our work force and undertake periodic reviews as required by Article 55 of the Fair Employment and Treatment (NI) Order 1998." It also says it will "take remedial action to eliminate any imbalance or distortion." Crane's harassment policy lists specific offenses that are inappropriate in the workplace and states, "It should be noted that it is the impact of the behavior which is relevant and not the motive or intent behind it."

Underrepresentation analysis: Catholic representation is up from only 7.9 percent in 1996 but Catholics continue to be clearly underrepresented at the company, with the vast majority of clerical and skilled staffers being Protestants. The ideal Catholic representation at the company is nearly 39 percent Catholic; the 14 percent Catholic work force falls far short of this mark. Protestants accounted for 70 percent of the applicants in 2008 and 73 percent of the new hires.

The company's location has been off-putting to Catholics, but Crane appears to have made efforts recently to counteract this problem. A company official told the Northern Ireland Service in 2003 that "we do our best," but that the plant is in a Protestant area and "people have to be comfortable to work there." In its 2006 survey response, the company said, "The workplace is a neutral environment, all employees including new hires are made aware of the company's Equal Procedure."

Conformance with MacBride principles: The company has no MacBride implementation agreement. For the last several years, Crane has received a shareholder proposal asking it to implement the principles. Most recently, in 2006 the resolution got 13.4 percent support and in 2007 it got 12.1 percent support; support fell to 11.4 percent in 2008, but the proposal is eligible for resubmission for 2009. A company official indicated to the Northern Ireland Service in 2003 that the company considers the annual reporting requirement for an agreement on MacBride implementation to

be too onerous. Reporting requirements under Northern Ireland's fair employment law are considerably more detailed than the referenced survey, however. In its 2007 proxy statement urging investors to vote against the shareholder resolution, management said that adoption of the MacBride principles would be duplicative of current policies and would make the company "accountable to two sets of similar but not identical fair employment guidelines," which would be burdensome. It also said adoption of the principles "could lead to confusion, conflicts and, potentially, unfairness in the workplace."

Affirmative action outreach - Management has taken some steps to increase the number of Catholics in its work force. In its 2006 and 2008 survey responses, management suggested that its recruitment procedures preclude a need to further affirmative action measures. In response to questions regarding affirmative action, the company reported that "all vacancies are advertised in newspapers that provide for both sections of the community" and noted that it advertises in "all job centers" and puts an EEO statement in its ads. The company uses job markets in predominately Catholic areas to boost the number of Catholic applicants and includes a welcoming statement in its ads.

Grievances -No fair employment grievances have been filed against the company in recent years. Crane Stockham has a grievance policy, which informs employees that they can raise issues with a manager of their choosing. The policy also lays out the procedure and timeframe for handling and resolving complaints.

Crawford & Co.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Feb-2004	Affirmative Action	NA	FET Settlements	0

• Crawford & Co. (UK)

Location	Belfast		
Business	insurance services		
Employees	(Data as of 2009)		
	Protestant	29	64.40%
	Catholic	16	35.60%
	Other	6	
	Total	51	

2009 Survey Response: Full

Available information: Crawford's office in Belfast processes liability and property claims. Crawford says that it is "the world's largest independent provider of claims management solutions to insurance companies and self-insured entities, with a global network of more than 700 offices in 63 countries." The company regularly provides complete responses to the Northern Ireland Service survey, providing information on its employees and a description of its fair employment policies, and responded also to the 2009 survey. Crawford's work force nearly doubled between August 2007 and July 2008, rising from 26 to 45 employees. Although not as fast as two years ago, Crawford is still hiring in Northern Ireland, as can be seen by last year's 13.3-percent increase rate in the company workforce.

Compliance with NI fair employment law and Code of Practice: The company says its operations adhere to Northern Ireland fair employment law and the recommendations of the Code of Practice. Specifically, it says it always publicly advertises all job openings, and notifies all employees of positions open to internal applicants. It uses the Belfast Telegraph, internet and the company intranet to post vacancies, and it uses an EEO statement in ads. During hiring and selection, it sometimes uses a panel with more than one person to interview job candidates, and sometimes is able to ensure cross-community representation on panels (the small size of its management team may preclude this). All those involved in candidate selection have received EEO training, and the company reviews the religious composition of applicant pools and new hires to determine community success rates. Although Crawford never discusses with trade unions to ensure that redundancies do not have a disproportionate impact on one group, in last year's survey response the company said it works closely with its London human resources team to ensure that redundancy and promotion decisions "are made in a proper fashion." The company says that while it has a very small team in Northern Ireland, it is "determined in a proper way to take every opportunity to target fair levels of representation." Northern Ireland senior management and U.K. management are charged with overseeing the company's equality policy in Northern Ireland, and they never consult with trade unions or other worker representatives on equality policy issues.

The company's U.S. website says that it will not discriminate based on "race, creed, color, religion, sex, sexual orientation, age, national origin, Vietnam veteran status, or the presence of any sensory, mental or physical disability, unless based upon a bona fide occupational qualification. Further, Crawford & Company will not tolerate harassment based on any of these categories. This policy applies to recruitment or recruitment advertising, hiring, training, upgrading, promotion, demotion, transfer, termination, rates of pay or other forms of compensation, and all other aspects of employment." The company periodically "analyzes all areas of employment in the Corporation to assure adherence to the principles of equal opportunity." Should a complaint arise, the company provides its employees with a confidential filing.

Underrepresentation analysis: No group appears to be underrepresented at the occupational level or company-wide.

Conformance with MacBride principles: In February 2004, the company's board of directors passed a resolution officially accepting the MacBride principles, prompting the New York City pension funds

to withdraw a shareholder resolution on the subject. The company says it is "committed to fair employment and positively operating and supporting the initiatives." Compliance is ensured by "knowledge, implementation and monitoring of the principles."

Affirmative action outreach - No affirmative action is warranted given the present work force composition.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal. The company reports that it has grievance and equal opportunity policies, which are made available to employees through the internal company database. Crawford also reported, "For many years we have operated in Belfast, supporting clients from both sections of the community. Never has there been any bias or allegation of bias against us from any quarter."

Danaher

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Feb-2003	Affirmative Action	NA	FET Settlements	0

• Qualitrol Hathaway Instruments

Location	Belfast		
Business	power utility monitoring equipment		
Employees	(Data as of 2008)		
	Protestant	41	60.30%
	Catholic	27	39.70%
	Other	6	
	Total	77	

2009 Survey Response: None

Available information: Danaher acquired the power and process segment of Hathaway Corp., which owned Hathaway Systems in Northern Ireland, in 2002. Employment at the company has fluctuated over the years between 51 in 2004 and 70 in 2000, rising to 77 in 2008.

Compliance with NI fair employment law and Code of Practice: Danaher's corporate standards of conduct apply to all its subsidiaries; breach of the EEO policy is considered gross misconduct. The company says its operations adhere to Northern Ireland's fair employment law and Code of Practice. All jobs at the company are publicly advertised and all employees are notified of positions open to internal applicants. Ads are placed in the Belfast Telegraph and in government job markets. The company always uses a panel with more than one person when interviewing job applicants, and sometimes ensures cross-community representation, but does not review the religious composition of applicant pools and new hires to determine community success rates. This level of monitoring is not necessary if the company's balance appears to be fairly representative of the area where it is located, as is the case with Danaher.

Selection for redundancy is based on an employee rating procedure involving performance, qualifications, ability, timekeeping and responsibilities and does not appear to be done on a last-in, first-out basis. Employees are selected for promotion based on merit, while training is provided to employees as needed for the job.

Danaher says that there is "close management involvement in EEO" and that monitoring reports are given monthly to senior management.

Underrepresentation analysis: Both communities appear to be fairly represented in the work force, although the proportion of Protestants in the workplace has fallen in recent years. The Northern Ireland Service compared the company's work force to a weighted catchment area that considered all of Northern Ireland for the company's upper level jobs and Belfast travel-to-work area for clerical and manual jobs.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation in February 2003, prompting the New York City pension funds to withdraw a shareholder resolution on the subject. The company says it ensures compliance with the principles through application of its EEO policy and corporate standards of conduct. Local management have been made aware of Danaher's intention to comply with the MacBride principles, as well.

Affirmative action outreach - No affirmative action efforts appear warranted.

Grievances -No fair employment grievances have been filed against the company in recent years. The EEO policies "prohibit unlawful discrimination and specifically encourage employees to go to a higher level of management with concerns if necessary," Danaher reports. Employees are suspended pending an investigation and statements from witnesses, and an appeals process is in place. The company's grievance policy allows for employees to file confidential complaints and to raise issues with someone other than their immediate supervisor, which may include a colleague of the same community background.

Deloitte Touche Tohmatsu

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Deloitte & Touche

Location	Belfast		
Business	accountants		
Employees	(Data as of 2007)		
	Protestant	82	53.60%
	Catholic	71	46.40%
	Other	19	
	<u>Total</u>	<u>172</u>	

2009 Survey Response: None

Available information: The company, a private firm based in New York City, operates an accountancy office in Belfast according to the company's website. Employment at the firm grew from only 64 in 1996 to 134 workers in 2003 and moved up to 172 in 2006.

Compliance with NI fair employment law and Code of Practice: No information is available about the company's fair employment practices.

Underrepresentation analysis: Protestants appear to be underrepresented at the company when the overall work force is compared to the 33 percent Catholic Belfast travel-to-work area, although the percentage of Protestants in the workforce grew by four points in the most recent monitoring period.

Conformance with MacBride principles: The company has no agreement on MacBride implementation but also as a private firm has never received a shareholder resolution on the subject or pressure from investors, the usual routes to an agreement.

Affirmative action outreach - The company appears to have some obligation to conduct affirmative action outreach aimed at boosting the number of Protestants in its work force, although there is no indication that the company has taken these steps.

Grievances -Four complaints have been filed against the company in the last three years; all were withdrawn.

Disney (Walt)

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Nov-1996	Affirmative Action	NA	FET Settlements	0

• The Disney Store

Location	Belfast
Business	specialty retail
Employees	(Data as of 2009)
	Total 22

2009 Survey Response: Full

Available information: The Walt Disney Co. opened a branch of its retail operation, The Disney Store Ltd., in Belfast in late 1994. The company has since sporadically provided detailed responses on its operations to the Northern Ireland Service survey. The company currently employs 22 full- and part-time workers in Northern Ireland, and did not provide the Northern Ireland Service with a breakdown between the two groups. The Belfast management team has attended an FEC training course and gave feedback to store employees.

Compliance with NI fair employment law and Code of Practice: The company's recruitment and hiring procedures generally appear to be consistent with fair employment law and the Code of Practice, although the company's grievance procedure makes no mention of political or religious discrimination. The company noted in 1995 that its policy "doesn't mention any discrimination so it isn't directly excluding" consideration of political or religious grievances. All vacancies are advertised by the Training and Employment Agency in Northern Ireland.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. However, both communities seem to be represented in the work force.

Conformance with MacBride principles: The company reported in its 2009 survey response that it is in compliance with MacBride Principles. It reached an agreement on implementation of the MacBride principles after discussions with the New York City Comptroller's office in 1996, although it reported in 1998 that it had not formally endorsed the principles.

Affirmative action outreach - No affirmative action appears warranted.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal.

Doctors' Associates Inc.

MacBride Agreement	No	Underrepresentation		FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

- **Subway**

Location	approximately 100 locations throughout the province
Business	restaurant
Employees	(Data as of 2009)
	Total 500

2009 Survey Response: None

Available information: Subway recently opened its 100th sandwich shop in Northern Ireland. The stores are owned and operated by a half-dozen or more franchisees, only one of which--Midhill Ltd.--is recognizably listed in the Register of Employers. Subway's privately-held parent company has never responded to the Northern Ireland Service's requests for information.

Domino's Pizza Inc.

MacBride Agreement	No	Underrepresentation	NA	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	1

• Domino's Pizza

Location	12 locations province-wide
Business	carryout pizza
Employees	(Data as of 2008)
	Total 35

2009 Survey Response: None

Available information: Domino's held its initial public offering on July 13, 2004. Private firm Bain Capital owns 45 percent of Domino's stock. The pizza company franchises more than 90 percent of its locations, and recently has been expanding internationally. The company has 11 stores in Northern Ireland: Belfast (4 locations), Bangor (3 locations), Ballymena, Coleraine, Lisburn (2 locations) and Newtownabbey. Neither Bain Capital nor Domino's has responded to inquiries for further information about fair employment policies at the operations in Northern Ireland. Because the operations are franchises, they do not report under the Domino's name to the Equality Commission, and no information is available on the number of people employed or the religious breakdown.

Conformance with MacBride principles: In 2007, the New York City pension funds for the first time proposed a shareholder resolution asking Domino's to implement the MacBride principles. When the funds found that the company's proxy did not include their resolution, they approached the company with proof that the proposal had been received in its mailroom. To spare the company the expense of a supplemental mailing, New York offered to withdraw the proposal if the company agreed to implement the principles, which would have required it to agree to respond to the annual Northern Ireland Service survey about its policies and employment statistics in Northern Ireland. According to a New York City representative, Domino's initially seemed receptive, but several days later told the proponents that "Domino's has determined that it is not willing to, nor to undertake to urge its franchisee to, come under the review of IRRC" (the former parent of the Northern Ireland Service, which is now part of RiskMetrics).

At that point, Domino's asked New York to "withdraw the proposal for this year and allow us to include it in next year's proxy to avoid the expense of mailing." New York declined, and 14 days before the annual meeting, the company sent out supplemental materials containing the resolution. The materials did not include an official company statement of opposition; because of the tardiness of the notice to shareholders, SEC rules prevented the company from printing one.

Domino's management opposed a 2008 New York City shareholder resolution requesting compliance with the MacBride principles; the resolution received 2.5 percent support, leaving it ineligible for resubmission. While this is an unusually low vote for a MacBride proposal, a New York City representative explained that the founding family owns a large chunk of Domino's stock.

Affirmative action outreach - The company also has its own U.K./Northern Ireland Website and has stated its own Equal Opportunity Policy.

"Domino's Pizza is an equal opportunity employer committed to the development of positive policies to promote equality of opportunity in employment. Our aim is to ensure that no job applicant or employee receives less favourable treatment on the grounds of sex, marital status, race, colour, creed, ethnic origin, sexual orientation, religious beliefs, age or disability."

Grievances -In 2006, Domino's Pizza settled a claim brought against it at the Fair Employment Tribunal.

DuPont (E.I.) de Nemours

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Mar-1992	Affirmative Action	No	FET Settlements	0

• DuPont UK Industrial Ltd.

Location	Derry		
Business	Kevlar		
Employees	(Data as of 2009)		
	Protestant	62	33.30%
	Catholic	115	66.70%
	Other	1	
	<u>Total</u>	<u>178</u>	

2009 Survey Response: Full

Available information: DuPont operates a Kevlar production facility in Londonderry, Northern Ireland.

Compliance with NI fair employment law and Code of Practice: The company's policies and procedures are in compliance with Northern Ireland fair employment laws. A human resources department in Northern Ireland manages the recruitment process, but it relies on a central human resources office in Spain to streamline questions from candidates and recruitment agencies, which short-list candidates using objective criteria and aptitude tests. The recruitment agencies also send out applications and keep track of monitoring information. Job advertisements are placed in market-specific magazines, the Belfast Telegraph and the Derry Journal and are also advertised internally. Employees involved in candidate selection have completed EEO training. DuPont reviews the religious composition of its applicants to determine success rates by community. The company conducts diversity training for all of its employees and requires that employees pass tests demonstrating an understanding of company policies.

UK and Northern Ireland managers as well as corporate headquarters and the corporate board oversees the company's equality policy.

Underrepresentation analysis: No group appears to be underrepresented at the company when the work force is compared to a weighted catchment area that considers all of Northern Ireland as the recruitment area for senior level jobs, the Londonderry travel-to-work area for associate professionals and skilled employees and Derry for elementary occupation workers who make up the rest of the work force. This area, weighted by job category, would be about 60 percent Catholic, which is in line with the composition of the company's work force.

DuPont does not recognize sectarian holidays, including St. Patrick's Day and the July 12th Drumcree parades.

Conformance with MacBride principles: DuPont reached an accord with shareholder proponents of the MacBride principles in 1992 and has cooperated with the monitoring process by the Northern Ireland Service. It met with Service staff in 2006.

Affirmative action outreach - No affirmative action efforts are warranted.

Grievances -No fair employment grievances have been filed against the company in recent years. DuPont has a grievance policy that allows employees to file complaints confidentially or with someone other than their immediate supervisor.

Emerson Electric

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Sep-1998	Affirmative Action	No	FET Settlements	0

• Copeland Ltd.

Location	Cookstown, Co. Tyrone		
Business	scroll compressors		
Employees	(Data as of July 2008)		
	Protestant	82	43.40%
	Catholic	107	56.60%
	Other	30	
	Total	219	

2009 Survey Response: None

Available information: The company began production in April 1997. Emerson has provided regular survey responses, giving detailed information on work force composition and its equal opportunities policy. The company eliminated 55 positions in the most recent monitoring period.

Compliance with NI fair employment law and Code of Practice: The company says its employment practices adhere to Northern Ireland fair employment law and the Code of Practice. Its EEO policy forbids discrimination on a variety of grounds, including "perceived religious belief or political opinion." The policy also says Copeland "does not practice positive discrimination." Failure to comply with the policy can result in dismissal. Copeland advertises openings in the Belfast Telegraph, local and regional newspapers, and in government job centers. It also includes EEO statements in its ads. Interviews are always conducted by more than one person, cross community representation is ensured where possible, staff involved in candidate selection have received EEO training and applicant success rates are tracked by religion. The EEO policy calls for careful record keeping at each stage of hiring and promotion, as stressed by the Equality Commission and Code of Practice. The redundancy policy specifically calls for no discrimination, and sets up an appeals procedure for complainants. Copeland has not set up a consultation process with worker representatives on equal employment issues.

Underrepresentation analysis: When compared to the Cookstown area, which is 54.6 percent Catholic, Protestants appear to be underrepresented at Copeland, particularly in the skilled worker employment category, although the workforce as a whole has become slightly more Protestant, from 42 percent to 43.4 percent. The company did not provide information on the community background of workers whose positions were eliminated. Nearly 70 percent of job applicants and 77 percent of 17 new hires whose religious communities were identified were Catholic, showing a significant underrepresentation of Protestants.

Conformance with MacBride principles: In September 1998, Emerson reached an understanding with MacBride advocates on implementation of the principles and independent monitoring. The company says that its policies reflect the fair employment standards of the principles. Corporate officials from Emerson also have said they believe the company is "doing the right thing" in Northern Ireland by providing jobs and employment opportunities in disadvantaged areas.

Affirmative action outreach - Copeland's policy notes that it will take affirmative action and set goals and timetables "where necessary."

Grievances -One complaint was filed against the company in 2003; it was withdrawn in December 2004.

Gap

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• GPS (Great Britain) Ltd.

Location	Belfast (2 locations) and Banbridge		
Business	retail clothing		
Employees	(Data as of 2009)		
	Protestant	10	58.80%
	Catholic	7	41.20%
	Other	2	
	Total	19	

2009 Survey Response: Full

Available information: The Gap regularly responds to the Northern Ireland Service surveys, providing work force data and descriptions of its fair employment practices. It owns and operates two retail clothing stores in the Belfast city center that are part of Gap's subsidiary GPS (Great Britain) Limited. There have not been any redundancies for the past few years, a trend confirmed in the 2009 survey, and the work force has remained stable with about 40 to 50 full-time workers (55 in 2009). Part-time workers make up 53 percent of Gap's staff in Northern Ireland.

Compliance with NI fair employment law and Code of Practice: The Gap says it complies "with all relevant regulations" of local fair employment law, the Code of Practice, and the MacBride principles. The company includes an EEO statement in its advertisements and always notifies employees about positions open to internal applicants. It also recruits through government-sponsored job fairs held in designated areas. Employees involved in candidate selection sometimes receive equal employment training, and the company says it only authorizes managers trained in applicant screening and interviewing to recruit candidates. According to the company, all employees participate in training on workplace discrimination issues, and "may contact their line manager, district manager or human resources department to express any concerns." The Gap's human resources department monitors the company's work force composition, and the district, regional human resources and recruitment managers all visit regularly "to confirm that the fair employment procedure is being followed.", Moreover, U.K. management oversees the company's equality policy. The Gap has not made any employees redundant, but it has a procedure in place that provides payment packages more generous than that required under UK law. Its district manager and human resources support are trained "to monitor practices in stores to identify and implement improvements."

Underrepresentation analysis: The Northern Ireland service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

Conformance with MacBride principles: The company says its policies reflect the fair employment standards embodied in the MacBride principles and it has responded regularly to the Northern Ireland Service's surveys. Gap shareholders have never voted on shareholder resolutions specifically requesting implementation of MacBride, the usual route to agreements between companies and MacBride advocates. It meets the conditions of such agreements and agrees that its policies reflect the fair employment standards embodied in the principles. The Minnesota State Board of Investment withdrew shareholder resolutions asking for reports on the operation in 1995 and 1996 after the company prepared the reports.

Affirmative action outreach - No affirmative action measures appear warranted at this time.

Grievances - The company reported that an individual filed a discrimination claim against a former store manager in 2004. The case was dismissed in 2005. At the time of the filing, a Gap representative said, "the claimant has been in breach of a tribunal order with respect to this claim for many months" and that "on this basis, we expect the claim to be struck out of court which will be decided in a pre-hearing." No other complaints have been filed against Gap at the Fair Employment Tribunal.

Gap has a grievance policy that strictly outlines formal and informal procedures for dealing with complaints and allows the parties to appeal a decision twice before a Senior Manager renders a final decision. The company encourages employees to relay grievances to their supervisors, their supervisor's superior, or human resources. The company also has an employee assistance program, called LifeWorks, which is there to provide advice and support to employees dealing with workplace issues.

General Electric

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Sep-1998	Affirmative Action	Yes	FET Settlements	0

• GE Medical Systems

Location	Belfast		
Business	sales/service of medical equipment		
Employees	(Data as of Aug. 2006)		
	Protestant	7	46.60%
	Catholic	8	53.30%
	Other	0	
	<u>Total</u>	15	

2009 Survey Response: None

Available information: GE Medical Systems has a small operation in Belfast. Employment at the company grew from only three in 1998 to 15 in 2006, the last year for which data are available. Workers at the service office maintain the company's medical diagnostic imaging equipment used in hospitals and clinics in Northern Ireland. GE provided a copy of the company's 2006 monitoring report that it submitted to the Equality Commission.

Compliance with NI fair employment law and Code of Practice: GE Medical Systems says the company's policies adhere to fair employment law in Northern Ireland. The company states that all job openings are publicly advertised in the Belfast Telegraph. The company notifies all employees about positions open to internal applicants. Employees who are involved in candidate selection have received EEO training and interview panels are always represented by both communities. It occasionally reviews the religious composition of its applicants and new hires to determine success rates by community. The company notes that management receives training on sectarian harassment using materials from the Equality Commission.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

Conformance with MacBride principles: GE reached an agreement with MacBride activists in 1998 about MacBride implementation.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal in recent years. With regards to its grievance procedures, the company says "standard GE procedures are in place."

General Electric

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Sep-1998	Affirmative Action	Yes	FET Settlements	0

• Hurst (Charles)

Location	Belfast and seven other towns		
Business	vehicle sales, service		
Employees	(Data as of 2007)		
	Protestant	683	73.70%
	Catholic	244	26.30%
	Other	67	
	Total	994	

2009 Survey Response: None

Available information: GE's wholly owned Woodchester Investments subsidiary holds a 24 percent equity stake in Lookers PLC, the owner of Charles Hurst. Charles Hurst acquired Savilles Auto Village in November 2003 and reported in 2005 that the latter's employment information is tallied with Hurst's figures in its survey response. Charles Hurst responded fully to the Northern Ireland Service survey for the first time in 1999 and since then it has regularly submitted responses, though it did not submit responses in 2007 or 2008. In 2005, company representatives also met with Northern Ireland Service staff.

The company's work force has expanded substantially in the last few years, growing to the present level of 994 full-time workers from only 566 in 1997. Hurst has 18 locations including car dealerships, tire repair stores and/or repair shops in Bangor, Belfast (eight sites), Coleraine, Lisburn, Londonderry, Newtownabbey, Newtownards, Omagh and Portadown (three sites). Company representatives told the Northern Ireland Service that they expect work force levels to hold steady in the next several years.

Compliance with NI fair employment law and Code of Practice: Charles Hurst reached an affirmative action agreement with the Fair Employment Commission in November 1998 and subsequently drafted a new equal opportunities policy and provided EEO training to all staff. Charles Hurst's managing director has overall responsibility for equal employment programs, and the personnel manager has day-to-day responsibility. The only positions not advertised publicly are those at the most senior level where the Board of Directors may promote someone within the company. In 2005, company representatives reported that most of its positions are advertised online or through government-sponsored job centers. Interview panels always represent both communities and those involved in candidate selection receive EEO training. Charles Hurst reports that it reviews the religious composition of its applicant pool and new hires and that it conducts exit interviews with those leaving the company.

Underrepresentation analysis: Catholics appear to be significantly underrepresented at Charles Hurst when higher level positions are compared to a catchment area that includes all of Northern Ireland and the other remaining staff is compared to more narrow estimates. In the most recent monitoring period, Catholics were also underrepresented among new hires.

Charles Hurst has argued that the imbalance in its work force stems from its acquisition of three companies that had predominately Protestant employees, Neville Johnston, David Prentice and Savilles Auto. Two of those companies were conducting affirmative action plans when they were acquired.

Conformance with MacBride principles: GE reached an agreement on the MacBride principles in 1998.

Affirmative action outreach - In its 1998 affirmative action agreement with the Equality Commission, Charles Hurst set a target of increasing the Catholic proportion of applicants and appointees to not less than 35 percent over the first three years of the plan. It met this goal in 2002 and exceeded it in the 2005 monitoring period when nearly 38 percent of applicants with identified religion were Catholics. It also set an initial goal of increasing the Catholic proportion of its work force to 25 percent in three to five years and a longer term goal of 30 percent in five to 10 years. It has succeed in

meeting the first goal, but not the later; Catholics currently account for about 25 percent of the work force. Company representatives said they seek the best caliber of applicants and from that pool, select the best person for the job. They believe, "without discrimination against Protestants, you can't do it any other way."

Grievances -One man alleging religious discrimination filed two complaints against the company in the past three years; both are pending.

Goodrich

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2002	Affirmative Action	NA	FET Settlements	0

• Goodrich Control Systems

Location	Belfast		
Business	software engineering		
Employees	(Data as of July 2008)		
	Protestant	22	68.70%
	Catholic	10	31.30%
	Other	3	
	Total	35	

2009 Survey Response: None

Available information: Goodrich bought TRW's aeronautical unit, which included an operation in Northern Ireland, in 2002. TRW responded to the Northern Ireland Service survey and Goodrich has likewise consistently completed the survey. The company's work force composition has not changed during the most recent monitoring period.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to the Fair Employment and Treatment (Northern Ireland) Order 1998 and to the Code of Practice. The site manager and human resources manager are jointly responsible for equal opportunities policies and practices. The company reports that "all employees are advised of our equal opportunity policy." Goodrich uses the Belfast Telegraph and the Internet to advertise job opportunities. All employees are notified of positions open to internal applicants, but not all internal transfers/promotions are advertised externally. When selecting new hires, Goodrich always uses an interview panel with a member of the human resources department in England present. Both communities are not always represented on the interview panel, but everyone with the authority to hire candidates receives equal opportunity training. The company does not review its applicant pool by religious community to determine success rates.

Underrepresentation analysis: Goodrich does not monitor from which district council areas it draws its employees. The company employs workers in three categories, but the vast majority are employed as professionals. Both communities appear to be fairly represented at the company. Catholics account for about 31 percent of the work force and this portion is in line with the figures for all of Northern Ireland -- the best catchment area for this category -- at 42.7 percent.

Conformance with MacBride principles: Goodrich affirmed in December 2002 that it was committed to equal employment worldwide and in its new Northern Ireland operations. It said its practices "reflect the fair employment standards embodied in the MacBride principles as amplified" and that it would cooperate with monitoring by the Northern Ireland Service. TRW reached a similar agreement earlier in 2001.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal. With regard to its grievance procedure, the company says that its human resources department in Birmingham, England, is the first point of contact for employees with complaints.

Goodyear Tire & Rubber

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Nov-2000	Affirmative Action	?	FET Settlements	0

• Hi-Q Tyre Service

Location	28 locations province-wide	
Business	tire services	
Employees	(Data as of 2009)	
	Total	150

2009 Survey Response: Partial

Available information: Hi-Q Tyre Service locations in Northern Ireland are all owned and operated by dealer partners or franchisees of Goodyear, and are not directly controlled by it. Goodyear authorizes these dealers to use the Hi-Q Tyre Service designation in signage. They combine the former operations of Motorway Tyres & Accessories, which in 2002 employed 31 people, and former Dunlop Tyres retail operations. Hi-Q is believed to have approximately 30 locations in Northern Ireland. The company does not appear under this name in Equality Commission reports and the Northern Ireland Service has estimated the total number of employees, figuring about five workers per location. Goodyear did not provide any information on the fair employment policies of its Hi-Q franchise and dealer companies. There are more than 200 Hi-Q retail stores owned by Goodyear around the United Kingdom. No discrimination cases have been filed against the company at the Fair Employment Tribunal.

Grievances -No claims have been filed against the company at the Fair Employment Tribunal.

Grant Thornton LLP

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Grant Thornton

Location	Belfast		
Business	auditing and consulting services		
Employees	(Data as of 2009)		
	Protestant	70	58.80%
	Catholic	49	41.20%
	Other	12	
	<u>Total</u>	<u>131</u>	

2009 Survey Response: None

Available information: The company is a worldwide partnership that provides accounting, tax and business advice to medium sized companies. Its member companies are run independently of the headquarters in the United States. The company's work force in Northern Ireland has been about the same size for the last several years. It has failed to respond to the annual Northern Ireland Service surveys.

Compliance with NI fair employment law and Code of Practice: No information is available about the company's fair employment policies in Northern Ireland. The company's UK website says, "We believe that people are our greatest asset and we seek to ensure that all our staff are treated fairly and with respect, regardless of creed, race or sex. "

Underrepresentation analysis: When the company's work force is compared to Northern Ireland's working population, no group appears to be underrepresented, but compared to the Belfast travel-to-work area, Protestants appear to be underrepresented. Catholic representation at the firm has risen from only 25 percent in 1998 to the present level of 41 percent.

Conformance with MacBride principles: The company does not appear to have taken a position on the MacBride principles.

Affirmative action outreach - No affirmative action appears warranted given the current work force breakdown at the company.

Grievances -The Northern Ireland Service is not aware of any discrimination cases filed against the company at the Fair Employment Tribunal in Belfast.

H.I.G. Capital Management

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	Yes	FET Settlements	0

• Stream International (NI)

Location	Derry, Co. Londonderry		
Business	technical support call center		
Employees	(Data as of 2009)		
	Protestant	83	15.70%
	Catholic	446	84.30%
	Other	47	
	<u>Total</u>	<u>576</u>	

2009 Survey Response: None

Available information: Stream won European Call Centre of the Year awards in 2001 and 2002, and for the last few years its annual revenues have grown, according to press reports. Stream has been through several recent owners—now privately held H.I.G. Capital Management, and previously privately held Bain Capital and publicly traded R.R. Donnelley. The company was the first major investment project announced for Derry in the wake of the 1994 paramilitary ceasefires.

Compliance with NI fair employment law and Code of Practice: In general, Stream's fair employment practices and procedures comply with Northern Ireland's fair employment law and Code of Practice. In the past, it has provided the Northern Ireland Service with its harassment policy as well as its most recent triennial fair employment policy review that it submitted to the Equality Commission. Stream identifies itself as an equal opportunity employer in ads, and has publicized job openings widely, including in newspapers read by both communities; hiring procedures have appeared to be highly systematic. The company says it always uses an interview panel when interviewing job candidates, although it does not ensure that both communities are represented on panels. All employees involved in candidate selection receive equal employment training, and the company reviews the religious composition of applicants and new hires to determine success rates by community. It has conducted outreach in schools and was involved in special efforts to bring the unemployed into its work force, including participation in a "Women Return to Work Scheme."

The company also has a comprehensive harassment policy that specifically addresses sectarian harassment. Stream's site director in Northern Ireland has overall responsibility for implementation of the policy, with management expected to oversee all employees' compliance. The policy is introduced at employee induction and displayed throughout the company.

Underrepresentation analysis: According to data on the company's work force as of 2007, Protestants appear to significantly underrepresented at Stream, even in light of Londonderry's 68.6 percent Catholic population. (They are also underrepresented using a 78.9 percent Catholic travel-to-work area defined by the company in 2003.) Protestants were even more underrepresented among new hires, comprising only 14.3 percent of the 279 new hires from identifiable religious communities. Despite this imbalance, the percentage of Protestants at Stream increased by nearly one percentage point in the most recent monitoring period.

The company's factory is in the Ulster Science & Technology Park, an area close to heavily Catholic neighborhoods where Protestants have been intimidated in the past. Other U.S. companies in this area have experienced difficulties in hiring Protestants in proportions similar to their representation in the general Derry area.

Conformance with MacBride principles: The company indicated in its 2003 survey response to the Northern Ireland Service that it is compliant with the MacBride principles. MacBride advocates withdrew a 1999 shareholder resolution asking for implementation of the principles after reaching an accord with R.R. Donnelley in 1998. The next owner, Bain Capital, did not honor this agreement and never responded to inquiries from the Northern Ireland Service. The company is now owned by H.I.G. Capital Management, which likewise has not honored the agreement.

Affirmative action outreach - Stream appears to have an obligation to conduct affirmative action aimed at increasing the number of Protestants in its work force. The company has an affirmative action agreement with the Equality Commission and in its 2003 survey response, it listed several affirmative action steps it is taking to increase the proportion of Protestants in its work force. Stream uses a welcoming statement and EEO statement in all advertisements, has outreach programs in schools and uses job markets in underrepresented areas. The company also notes that managers and supervisors receive training that deals with sectarian harassment issues, and the company uses material from the Equality Commission, the Irish Congress of Trade Unions' Counteract project and the Engineering Employers' Federation. These efforts do not appear to have had a significant effect on recent hiring data, however.

Grievances -No discrimination cases have been filed against the company at the Fair Employment Tribunal.

Heartsine Technologies

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

- Heartsine Technologies Ltd.**

Location	Belfast
Business	medical equipment
Employees	(Data as of 2008)
	Total 28

2009 Survey Response: None

Available information: According to Heartsine's company website, it moved its European operations headquarters to a new facility in Northern Ireland in January 2003. No discrimination cases have been filed against the company.

Underrepresentation analysis: There are fewer than 10 Roman Catholics among Heartsine Technologies' 28 employees. The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

Hewlett-Packard

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1989	Affirmative Action	No	FET Settlements	0

• Hewlett-Packard

Location	Belfast		
Business	computer sales, consultancy and service		
Employees	(Data as of Aug. 2008)		
	Protestant	15	51.70%
	Catholic	14	48.30%
	Other	20	
	<u>Total</u>	<u>49</u>	

2009 Survey Response: None

Available information: Before its April 2002 merger with Hewlett-Packard, Compaq Computer regularly responded to the Northern Ireland survey, providing annual survey responses and arranging on-site interviews with local managers over the years--most recently in 1999. Employment at the company's Belfast operations, which were part of Compaq before the April 2002 merger of the two firms, now stands at 49 workers, down from 62 in the previous monitoring period. Before the merger, HP had five employees of its own in Belfast; these have been merged into the single HP operation.

Hewlett-Packard has joined Microsoft and other companies to create the School Technology Innovation Centers (STICs) in Belfast (with a sister school in Prague, Czech Republic), intended to help educators grasp new technologies and create innovative teaching tools.

Compliance with NI fair employment law and Code of Practice: The company's recruitment procedures appear to fall within the guidelines of the Code of Practice. It advertises available jobs on the Internet and includes an EEO statement in the ads. All employees involved in candidate selection have received EEO training. The company uses an interview panel when screening job candidates "where practically feasible," and reviews the religious composition of its applicants and new hires to determine success rates by community. Employees are notified of available positions at the company. Senior management in Northern Ireland and the UK as well as corporate headquarters are responsible for the company's equality policy.

Underrepresentation analysis: Neither group appears to be under-represented at the company, although the large proportion of workers identified as not belonging to either community could be a sign of poor monitoring by the company. Hewlett-Packard reports that its Belfast location is accessible to all districts and areas.

Conformance with MacBride principles: Hewlett-Packard appears to be honoring MacBride compliance commitments made by predecessor companies.

Digital Equipment, a predecessor firm to Compaq, reached an agreement with shareholders on MacBride implementation in 1989--the first company to do so. Compaq honored this agreement and said in 1999 that it "has in practice been taking lawful steps to implement the fair employment standards embodied in the MacBride principles" and "expects to continue to cooperate" with monitoring by the Northern Ireland Service.

Affirmative action outreach - The company's EEO policy commits the company to take "positive action" for groups "who have been traditionally disadvantaged" and were underrepresented in hiring or promotion over a 12-month period. The company is not conducting any affirmative action measures and does not appear to believe they are warranted.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal. The company has a grievance policy that allows employees to file complaints confidentially and with someone other than their immediate supervisor.

Hyatt Hotels Corp.

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• SMG Sheridan

Location	Belfast		
Business	arena management		
Employees	(Data as of 2009)		
	Protestant	12	60.00%
	Catholic	8	40.00%
	Other	2	
	<u>Total</u>	<u>22</u>	

2009 Survey Response: None

Available information: SMG Sheridan manages the Odyssey Arena, a Landmark Millennium Project for Northern Ireland. The Arena houses a cinema, a concert venue, the W5 discovery centre, the pavilion which offers bars and nightclubs and a space car park.

SMG is a joint venture with Hyatt Hotels and Aramark, a hospitality and facility management company based in Pennsylvania. Aramark responded to the Northern Ireland Service from 2002 through 2005, and responded in 2009 after a four-year gap in responses.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to all fair employment standards established by Northern Ireland law, and that its first triennial policy review was completed in January 2004. The company says it follows "best practice procedures as recommended by the Equality Commission and Northern Ireland HR consultants." The company recruits employees through public advertisements in the Belfast Telegraph, government job markets and the Internet. It always includes an EEO statement in its employment ads. SMG always uses a panel when interviewing job candidates, and sometimes ensures that both communities are represented. It says that all those involved in candidate selection receive training on equal employment issues, and that the company monitors the religious composition of the applicant pool and new hires to determine success rates by community. The company notes that all employees receive harassment training using materials from the Equality Commission. Senior managers at the company's operations in Northern Ireland are responsible for implementing SMG's EEO policy. Employees at the company have no union representation.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on representation issues at companies with fewer than 30 employees. The company's workforce shrank from 77 employees in 2007 to 22 in 2009. Although the Catholic presence has decreased in comparative terms (from 42.9% to 36.4%) more than the Protestant presence (from 57.1% to 54.5%), both communities were equally hit by the workforce reduction.

Conformance with MacBride principles: Since this facility is a joint venture between two private companies, it has never received a shareholder resolution on the MacBride principles, which is the usual route to an agreement. The company reported its policies reflect the fair employment standards embodied in the MacBride principles of fair employment and it agreed to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -The company reported that no complaints have been filed against it at the Fair Employment Tribunal and the most recent records from the FET concur.

Interface

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Apr-2001	Affirmative Action	Yes	FET Settlements	0

• Interface Europe

Location	Craigavon, Co. Armagh		
Business	carpet tiles		
Employees	(Data as of Feb 2008)		
	Protestant	29	29.90%
	Catholic	68	70.10%
	Other	1	
	<u>Total</u>	<u>98</u>	

2009 Survey Response: None

Available information: Interface has responded in detail to the Northern Ireland Service survey for several years. Representatives of Interface met with the Northern Ireland Service in 2003. The Northern Ireland facility is one of the company's European production centers for high quality carpet tiles. Employment at the company rose from 164 employees in 1996 to a high of 204 in 1998; the numbers since have dropped substantially, to just under 100 in 2008. Jobs have been cut because orders for the company's tufted carpets have dropped, and because it has moved production from Northern Ireland to factories in England and Holland.

Compliance with NI fair employment law and Code of Practice: Interface Europe revised its equal opportunities policy in 2004. The policy prohibits discrimination based on an employee's or applicant's sex, race, color, nationality, ethnic origin, disability, age, sexual orientation, trade union membership, marital or family status, or religious or political beliefs. The company also says it adheres to Northern Ireland fair employment law through "numerous policies concerning fair employment practices (including recruitment and selection, redundancy and promotion) and sectarian harassment." Interface Europe said it has solicited input from the Equality Commission on its policies "to ensure that they address all applicable requirements of fair employment legislation. In addition, to the company's knowledge, it has responded promptly and satisfactorily to all requests for reports from the commission on its fair employment practices."

All job openings are publicly advertised and all employees are notified about positions open to internal applicants. Interface Europe uses the Belfast Telegraph as well as local and regional newspapers to advertise vacancies. The company's selection policy and procedures appear to follow fair employment guidelines precisely; employees who do not follow the procedures may face reprimand under the company's disciplinary code. Interface Europe always uses an interview panel with more than one interviewer, ensures that both Protestant and Catholic communities are represented on panels, gives EEO training to those involved in candidate selection and reviews the religious composition of applicant pools and new hires to track hiring success rates by community affiliation. The company's redundancy selection procedures consider tardiness, attendance, discipline and length of service. Senior management in Northern Ireland and the UK oversee the company's equality policy.

Underrepresentation analysis: Protestants appear to be significantly underrepresented at the company's Northern Ireland location overall and in the plant and machine operative category when compared to appropriate catchment areas. The Catholic percentage at the company fell significantly in the most recent monitoring period, from 75.6 to 70.1 percent, the lowest level since the Northern Ireland Service began monitoring the company. The company says it considers all of Northern Ireland for managers and professionals, and believes that the rest of its catchment area is 42 percent Catholic, which is higher than the Northern Ireland Service's projected ideal percentage of slightly less than 34 percent Catholic. Nearly 90 percent of Interface's staff live in Craigavon, which is about 42.9 percent Catholic while the Craigavon travel-to-work area is 40.8 percent Catholic.

Protestants made up 40 percent of applicants and 50 percent of new hires in the most recent monitoring period. Trends in the applicant figures suggest the company is able to attract a substantial number of Protestants and that a change in the work force depends on hiring patterns. (In 2005, Protestants were

significantly underrepresented among applicants, but this appears to be an anomaly.) Still, it may take a significant amount of time to change the overall work force given the few hires typically hired in a year.

Conformance with MacBride principles: The company reached a MacBride implementation agreement in 2001. In its survey response, the company said it intends "to provide informative responses to requests...for information on our Northern Ireland operation, including, to the extent our Northern Ireland operation is required by law to gather and maintain such information, the number of applicants and employees of stated Protestant, Catholic or unknown religious affiliation reported by certain job descriptions." Interface Europe says it "has made and will continue to make all necessary lawful efforts to conduct our operation in Northern Ireland in accordance with fair employment standards, including those embodied in the MacBride principles, applicable to our operations." Interface Europe notes that the shareholder proponents of the MacBride principles "have acknowledged that providing security for employees while traveling to and from work is not applicable to our operations." In seven of the ten years before its agreement with the New York City funds, company shareholders voted on a shareholder resolution asking for implementation of the MacBride principles; the proposal received unusually high levels of support for a social policy issue.

Affirmative action outreach - Interface Europe has developed an employment equality plan with the Equality Commission as part of its triennial review process and provided a copy to the Northern Ireland Service. It included a timeline according to which the company would review its policies and procedures throughout 2005 and 2006. By August 2005, it aimed to "review training needs and develop equality training strategy." Interface Europe provides to new employees a copy of its Joint Declaration of Protection document, which commits the company and trade union to "take all reasonable steps to secure the safety of employees from intimidation or harassment in the workplace." It also prohibits the display of sectarian materials. The company says it "makes numerous affirmative action outreach efforts." It specifically welcomes Protestants in its ads, uses an EEO statement and uses government job markets in particular areas. It says it has "actively encouraged local job centers and recruitment agencies to promote vacancies with Protestant applicants." The company has set affirmative action goals agreed to with its trade union and has agreed to an affirmative action plan with the Equality Commission. The company notes that selection for training should not be made on the grounds of religious or political beliefs. It says that if there is an imbalance among trainees, the company may select courses in specific geographical areas, or confine training to a specific group of people, providing that it does not contravene other equality legislation. The company notes it has "undertaken outreach programs at Protestant schools and made/received school visits. However, due to limited resources, we have not done so in recent years."

Grievances -No complaints have been filed against the company in the past three years.

International Business Machines

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Nov-1992	Affirmative Action	NA	FET Settlements	0

• IBM United Kingdom

Location	Belfast		
Business	computer sales and service		
Employees	(Data as of 2008)		
	Protestant	18	62.10%
	Catholic	11	37.90%
	Other	3	
	<u>Total</u>	<u>32</u>	

2009 Survey Response: None

Available information: IBM responded in full to the Northern Ireland Service fair employment survey in 2008 for the first time since 2005.

Compliance with NI fair employment law and Code of Practice: The company's policies appear to adhere to the fair employment laws in Northern Ireland.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions about companies with fewer than 30 employees whose religious affiliation is identified. IBM classifies all of its Northern Ireland employees as managers or senior officials; using all of Northern Ireland as a catchment area for these jobs, it appears that both groups are fairly represented.

Conformance with MacBride principles: IBM and MacBride shareholder proponents reached an agreement in 1992. The company said that it would "make lawful efforts" to implement the principles, "to the extent they are applicable."

Affirmative action outreach - Affirmative action efforts at the company are not warranted.

Grievances - There have been no recent discrimination complaints filed against IBM in recent years.

Jacobs Engineering Group Inc.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Nov-2006	Affirmative Action	NA	FET Settlements	0

• Jacobs UK Limited

Location	Belfast				
Business	Civil consulting				
Employees	(Data as of 2006)				
	Protestant	15	68.00%		
	Catholic	7	32.00%		
	Other	3			
	<u>Total</u>	<u>25</u>			

2009 Survey Response: None

Available information: Jacobs Engineering Group Inc. offers consulting services to industrial, commercial and government clients worldwide. The company's subsidiary, Jacobs UK, began operating in Northern Ireland in the late 1990s. It won a contract from the Northern Ireland Department for Regional Development Water Service in May 2006. The company will support a \$380 million annual capital investment program. The Northern Ireland Service surveyed the company for the first time in 2006 and it responded in full, but the company has not responded since. The company did not appear in the Equality Commission's 2007 Monitoring Report, indicating that it had 25 or fewer employees during the most recent monitoring period.

Compliance with NI fair employment law and Code of Practice: The company reports that its policies adhere to the Code of Practice. Jacobs UK Ltd. notifies all employees when positions become available to internal applicants. Advertisements are published in a variety of sources, including the Belfast Telegraph, other local newspapers, job markets, trade publications and the company intranet. The company does not always use an interview panel when selecting candidates, but all employees involved in candidate selection are trained on equal opportunity employment issues. Management occasionally consults with trade unions on equality policy issues. Corporate headquarters and UK management oversee the company's equality policy. All managers receive training on sectarianism and intimidation issues.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. However, both communities appear to be fairly represented in the work force.

Conformance with MacBride principles: In its 2006 survey response, Jacob Engineering agreed to comply with monitoring by the Northern Ireland Service and reported that its policies adhere to the MacBride principles. Jacobs UK reported that senior management review local managers to ensure the standards embodied in the MacBride principles are maintained. However, the company has not responded to the Northern Ireland survey in recent years.

Affirmative action outreach - No affirmative action measures are warranted.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal. Employees can raise complaints confidentially or speak with someone other than their direct supervisor.

Kohlberg Kravis Roberts & Co.

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Toys 'R' Us

Location	Newtownabbey and Derry		
Business	toy retailing		
Employees	(Data as of 2007)		
	Protestant	72	59.00%
	Catholic	50	41.00%
	Other	12	
	Total	134	

2009 Survey Response: None

Available information: Toys R Us was acquired by an investor group led by Bain Capital, Kohlberg, Kravis Roberts and Vornado Real Estate Investment Trust in mid-2005. The company's initial response to monitoring by the Northern Ireland Service came in 1999, when it also met with Service staff at its north Belfast store. A second store opened in Londonderry in 2007. The two stores sell toys, baby care and family leisure and home entertainment multimedia products.

Compliance with NI fair employment law and Code of Practice: The company says it is an equal opportunity employer and fully complies with all aspects of Northern Ireland fair employment law. Its policies and programs appear to be consistent with the Fair Employment and Fair Treatment Order 1998 and the Code of Practice. It reports "all procedures and policies were agreed with the FEC prior to any recruitment commencing." Managers attend Equality Commission training, and the company posts its policies in all stores. The company always notifies all employees about positions open to internal applicants, and all employees receive training on equal employment issues. Toys R Us does not need to advertise job widely; signs posted in its Belfast store generate sufficient numbers of applicants. When using panels for job interviews, the company ensures that both communities are represented. It also says it systematically tracks applicant success rates by religion. The company promotes employees by merit and typically promotes from within for managerial posts.

Toys R Us has an equal opportunities policy that says "all recruitment, promotion and training will be based upon an individual's ability and job performance and will exclude any consideration of an applicant's/employee's religious beliefs, political opinion, race, sex, marital status or disability....Toys R Us will not directly or indirectly discriminate on the grounds of religious belief or political opinion....Breaches of this policy will be regarded as a disciplinary offense." Local management is responsible for complying with local fair employment legislation and, as recommended by the Equality Commission, direct responses to questions about religious affiliation are sent to independent personnel departments at the head office, according to the company. A confidential help line also exists for employees to voice questions or concerns.

Underrepresentation analysis: Neither group appears to be underrepresented at the company overall when its work force is compared to a catchment area that includes all of Northern Ireland. Employees at Toys R Us are either managers or sales associates and both of these employment categories have the widest recruitment area.

Conformance with MacBride principles: Toys R Us reached an agreement on implementation of the MacBride principles in April 1999 after receiving a shareholder proposal, but the companies that acquired Toys R Us have not endorsed the principles.

Affirmative action outreach - No affirmative action efforts currently appear warranted given the work force breakdown at the company. The company's EEO policy commits it "to adopt, where practical, affirmative action measures to ensure the provision of equality of opportunity and fair participation of Roman Catholics and Protestants."

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal.

Lauder (Estee)

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Mar-1998	Affirmative Action	?	FET Settlements	0

• Estee Lauder Cosmetics Ltd.

Location	Belfast		
Business	sale of cosmetic products		
Employees	(Data as of 2007)		
	Protestant	26	45.60%
	Catholic	31	54.40%
	Other	3	
	<u>Total</u>	<u>60</u>	

2009 Survey Response: None

Available information: In 2005, Estee Lauder reported its largest staff ever in Northern Ireland at 128 workers; this has since fallen significantly, to 95 workers in mid-2006 and 60 by the end of 2007.

The company only employs sales associates, who sell cosmetics in department stores around the province.

Compliance with NI fair employment law and Code of Practice: Estee Lauder says its policies and practices adhere to the Code of Practice. Estee Lauder's personnel policies appear to encourage the systematic practices favored by the Code, and although there is no specific reference to religious discrimination in the Northern Ireland context, Estee Lauder's recruitment manual urges staff to use objective criteria and not "race, religion or gender" so as to avoid allegations of discrimination. The company publicly advertises all job openings, using the Belfast Telegraph, local and regional newspapers, its company intranet and government job markets. Personnel involved in selecting candidates for hire receive EEO training. Interview panels are used, sometimes including representative from both communities, and the company reviews the religious composition of applicant pools and new hires to determine success rates by community. Redundancies are based on "competence, conduct, attendance and service," which are also the criteria for promotion. UK management oversee the company's equality policy.

Underrepresentation analysis: Estee Lauder's only employment category in its Northern Ireland operations are sales associates who work at various locations. These employees were compared to a catchment area that includes all of Northern Ireland, and Protestants appear to be underrepresented.

Conformance with MacBride principles: The company reached an agreement with shareholder proponents of the MacBride principles in 1998 and Estee Lauder implemented them.

Affirmative action outreach - Long-term applicant and hiring figures do not suggest any need for affirmative action for any group.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal. The company's grievance procedure allows for employees to raise confidential complaints and to raise issues with someone other than their direct supervisor.

Leprino Foods

MacBride Agreement Agreement Date	No	Underrepresentation Affirmative Action	No Yes	FET Discrimination Findings FET Settlements	0 0
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• Glanbia Cheese Ltd.

Location	Craigavon		
Business	dairy products		
Employees	(Data as of 2007)		
	Protestant	82	57.30%
	Catholic	61	42.70%
	Other	4	
	Total	147	

2009 Survey Response: None

Available information: Leprino Foods acquired a 49 percent stake in Glanbia Cheese Ltd. in 2000. The facilities of the joint venture, which also include another operation in Wales, are operated by Glanbia. Leprino is the world's largest maker of mozzarella cheese, which it supplies to pizza chains and food manufacturers. Leprino has not responded to any inquiries from the Northern Ireland Service. In February 2006, a worker died after falling into a processing machine at the plant.

Compliance with NI fair employment law and Code of Practice: Glanbia Cheese's website includes a statement that the company "is an Equal Opportunity Employer, committed to ensuring that the talents and resources of all our employees are utilised to the full. We will not discriminate unfairly against any individual in matters of recruitment and selection for any position, promotion, development or training on the grounds of perceived religious or political affiliation, sex, marital status, sexual orientation, age, disability, colour, race or ethnic origins."

Underrepresentation analysis: No group appears to be underrepresented at the company's operations when the overall work force is compared to several plausible areas. Catholic representation at the company has grown from just under 33 percent in 1999, and rose 6.8 percentage points in the most recent monitoring period.

Conformance with MacBride principles: The company has no agreement on MacBride implementation but as a private company also has never received a shareholder resolution or investor pressure on the subject, the usual routes to an agreement.

Grievances -No recent complaints have been filed against the company.

Liberty Mutual Insurance

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Liberty Information Technology Ltd.

Location	Belfast		
Business	insurance services		
Employees	(Data as of 2007)		
	Protestant	92	53.50%
	Catholic	80	46.50%
	Other	20	
	<u>Total</u>	<u>192</u>	

2009 Survey Response: None

Available information: Liberty Mutual, a privately held company in the Fortune 500, has never responded to Northern Ireland Service surveys about its Belfast operations, although it did provide minimal information a few years ago. The company established Liberty Information Technology Ltd. in Belfast in 1997, with financial assistance of £837,000 from Northern Ireland's Industrial Development Board (now InvestNI). The operation develops software for Liberty Mutual's internal use.

Compliance with NI fair employment law and Code of Practice: No information is available on the company's fair employment policies or practices.

Underrepresentation analysis: No group appears to be underrepresented at the company if the work force is compared to Northern Ireland, the most appropriate catchment area. The Equality Commission believes the company focuses its recruitment on recent graduates, a category whose composition is evenly split between the two communities.

Conformance with MacBride principles: The company's local human resources manager told the Northern Ireland Service in June 1998 that the operation adheres to Northern Ireland's fair employment law but not the MacBride principles, because of "legal concerns." As a private firm, the company has never received a shareholder resolution or other investor pressure on MacBride, the usual prompts for agreements on implementation of the principles.

Affirmative action outreach - No affirmative action appears warranted at present.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

Lockton Inc.

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Dec-2006	Affirmative Action	?	FET Settlements	0

• Lockton International Ltd.

Location	Belfast
Business	insurance broking
Employees	(Data as of 2007)
	Total 37

2009 Survey Response: None

Available information: Lockton Inc. bought Alexander Forbes International Risk Services from Alexander Forbes in November 2006. The Northern Ireland operations was subsequently rebranded Lockton International Ltd. The Northern Ireland office is in downtown Belfast and has seen its work force shrink a little in the last few years, falling from 52 employees in 2001 to 37 at present. The company responded to the Northern Ireland Service in 2005 and 2006, but has not responded since.

Compliance with NI fair employment law and Code of Practice: The company says that not all job openings are publicly advertised, but that it uses the Belfast Telegraph and recruitment agencies when it looks for external applicants. It always uses a panel with more than one person to interview job candidates; panels sometimes have cross-community representation, and staff involved in candidate selection sometimes have received EEO training. The company does not always review the religious composition of applicant pools and new hires to determine success rates by community, but this may not be necessary for this relatively small firm that appears to have no problems with underrepresentation.

The company provided a copy of its Northern Ireland EEO policy, which says it is committed to workplace equality of opportunity "regardless of...religious belief or political opinion." Alexander Forbes says it "regards any form of unlawful discriminatory behavior as a serious disciplinary offence." The corporate headquarters' office oversees EEO issues at the company.

Underrepresentation analysis: In 2006, Lockton reported that it employs workers in three categories, managers, associate professionals and administrators. That year, the company reported a 34-person work force that was 75.8 percent Protestant--a slight underrepresentation of Catholics, but not statistically significant. In 2007, the company reported to the Equality Commission that fewer than 10 of its 37 employees were Catholic. Based on the available information, the Northern Ireland Service cannot determine whether any group is underrepresented at the company.

Conformance with MacBride principles: The company said that its policies reflect the MacBride principles standards and it agreed to comply with monitoring by the Northern Ireland Service, but has not responded to surveys in recent years.

Affirmative action outreach - No affirmative action appears warranted.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal. Lockton has formal grievance procedures in place that allow workers to voice complaints without fear of victimization.

Madison Dearborn Partners

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Smurfit Kappa Group

Location	Craigavon and Newtownabbey		
Business	Packaging products		
Employees	(Data as of 2007)		
	Protestant	60	32.00%
	Catholic	133	68.00%
	Other	1	
	Total	194	

2009 Survey Response: None

Available information: Smurfit Kappa Group is a privately held packaging company with two operations in Northern Ireland, Smurfit Kappa Lurgan in Craigavon and Smurfit Kappa Packaging Belfast in Newtownabbey. The company provided a complete response to the Northern Ireland Service survey in 2006, reporting on both operations in one response, but has not responded since. The company reports that its policies reflect the fair employment laws in Northern Ireland as well as the MacBride principles. Protestants appear to be underrepresented in the 194-person work force when using several different statistical comparisons. They are particularly underrepresented among machine operatives. The Northern Ireland Service is not aware of the work force breakdown by location, but since two-thirds of the work force live in Craigavon it is reasonable to estimate that two-third of the employees work at the Craigavon site. The travel-to-work area for that location is about 41 percent Catholic but Catholics account for 68 percent of Smurfit Kappa's staff. Even if we assume all of Northern Ireland is a reasonable catchment area for all jobs at the company, the Catholic portion of Smurfit Kappa's work force still exceeds that of Northern Ireland, which is almost 43 percent Catholic. Despite the underrepresentation, Smurfit Kappa does not have an affirmative action plan and does not appear to recognize the work force imbalance. Senior managers in Northern Ireland oversee the company's equality policy.

Grievances -Two claims filed against Smurfit by the same employee were conciliated in 2005.

Manpower Inc.

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Manpower PLC

Location	Belfast		
Business	recruitment staffing solutions		
Employees	(Data as of 2007)		
	Protestant	169	39.70%
	Catholic	257	60.30%
	Other	41	
	Total	467	

2009 Survey Response: None

Available information: Manpower is a worldwide employment services company; its presence in Northern Ireland has expanded substantially from the early part of the decade, with a jump from only 62 employees in 2001 to 935 in 2003. Its work force has since shrunk significantly, to 821 workers in 2006 and 467 in 2007. The company has not responded to the Northern Ireland Service survey for several years, and management has opposed shareholder resolutions asking the company to adopt the MacBride principles.

Compliance with NI fair employment law and Code of Practice: No information is available about the company's fair employment policies or practices.

Underrepresentation analysis: Protestants are substantially underrepresented at the company when the work force is compared to either the Belfast travel-to-work area or to Northern Ireland as a whole. The Equality Commission says Manpower has very high level of turnover and that its entire staff may change on a yearly basis. In 2007, it hired 212 employees, 48 percent of whom were Protestant.

Conformance with MacBride principles: The company has not provided any information on its policies regarding MacBride compliance and it has not responded to the Northern Ireland Service survey. In response to shareholder resolutions in 2009, 2008 and 2007, the company said that while it supports the intent of the MacBride principles, subscribing to them would be duplicative of current policies and burdensome. The resolution got 11.5, 13.2 and 13.8 percent support in 2009, 2008 and 2007, respectively.

Affirmative action outreach - The company did not provide any information about any affirmative action efforts; outreach appears warranted given the apparent underrepresentation of Protestants.

Grievances - A complaint was filed against the company in April 2005 and was conciliated in 2006.

Marsh & McLennan

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1994	Affirmative Action	NA	FET Settlements	0

• Marsh (UK), Ulster Insurance Services, Marsh Finan

Location	Belfast and Strabane		
Business	insurance services		
Employees	(Data as of 2007)		
	Protestant	31	70.50%
	Catholic	13	29.50%
	Other	0	
	Total	44	

2009 Survey Response: None

Available information: Marsh & McLennan last responded to the Northern Ireland Service survey in 2003. In 2004, management at Marsh & McLennan explained that there was little time to deal with anything but a lawsuit filed by New York attorney general Eliot Spitzer.

Compliance with NI fair employment law and Code of Practice: The company says it follows the Code of Practice and Northern Ireland fair employment law. It says that fair employment issues are discussed at regular staff association meetings and that religious harassment is on the agenda at all Belfast executive meetings. The company includes a statement in its employment advertisements that it is an equal opportunity employer, although it advertises only in the Belfast Telegraph and government job markets; ads could get wider distribution if the company used all three daily Belfast papers. The company uses an interview panel with representatives from both sides of the community and tracks applicant success rates by religion. Company representatives involved in candidate selection have received training on equal employment issues and both communities are represented on interview panels. Marsh & McLennan uses materials from the Equality Commission to provide training and workshops on workplace harassment and intimidation to all employees, with separate training for managers. The company also works with the Irish Congress of Trade Union's Counteract project to address potential sectarian harassment and intimidation.

Underrepresentation analysis: Neither community appears to be underrepresented in the overall work force, nor was there underrepresentation in any individual job categories at the time of the company's last survey response when compared to a catchment area that includes all of Northern Ireland.

Conformance with MacBride principles: The company and shareholder activists reached an agreement on implementation of the MacBride principles in 1994.

Affirmative action outreach - Affirmative action efforts are no longer appear warranted as Catholics seem to have achieved fair participation in the overall work force and in individual job categories.

Grievances - No complaints have been filed against the company at the Fair Employment Tribunal.

Marsh & McLennan

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1994	Affirmative Action	No	FET Settlements	0

• Mercer Human Resources Consulting

Location	Belfast		
Business	pensions consultancy/administration		
Employees	(Data as of 2006)		
	Protestant	42	59.20%
	Catholic	29	40.80%
	Other	17	
	<u>Total</u>	<u>88</u>	

2009 Survey Response: None

Available information: Mercer Human Resources last responded to the Northern Ireland Service survey in 2003. In 2004, management at Marsh & McLennan explained that there was little time to deal with anything but a lawsuit filed by New York attorney general Eliot Spitzer.

Compliance with NI fair employment law and Code of Practice: The company says Mercer follows the recommendations as well as the legal requirements of the Code of Practice and that it adheres to the standards established by the Fair Employment and Treatment (Northern Ireland) Order 1998. The company advertises job openings on the Internet and in trade publications. MacBride proponents advocate advertising in all three Belfast dailies. The company uses an interview panel but says it never ensures that both communities are represented on the panel. Those involved in candidate selection have undergone training, and the company reviews the religious composition of applicant pools and new hires.

Underrepresentation analysis: Neither community appears to be underrepresented in the company's overall work force or in individual job categories when compared to weighted catchment areas that are 34.1 percent to 40.8 percent Catholic. The catchment areas consider all of Northern Ireland to be appropriate for managers, administrators and professionals and the Belfast travel-to-work area for its clerical and secretarial workers. Managers, professionals and associate professionals constitute more than 80 percent of its employees.

Conformance with MacBride principles: The company says that Mercer Human Resource Consulting recognizes the commitments made by Marsh & McLennan when it reached agreement on implementation of the MacBride principles with shareholder activists in 1994.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

McDonald's

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Dec-1994	Affirmative Action	Yes	FET Settlements	1
Location	2 company-owned locations; approximately 25 total locations province-wide				
Business	fast food				
Employees	(Data as of Aug. 2008)				
	Protestant	81	37.00%		
	Catholic	139	63.00%		
	Other	23			
	<u>Total</u>	<u>243</u>			

2009 Survey Response: Partial

Available information: McDonald's owns and operates two restaurants; an additional 25 or so are operated by franchisees.

The company has regularly completed the Northern Ireland Service survey, describing its fair employment policies and providing overall employment information for its franchise operations.

Compliance with NI fair employment law and Code of Practice: The company says that McDonald's Restaurants Ltd. "follows Northern Ireland law concerning the recruitment, interviewing and hiring process." The company "uses an independent outside consultant to compile information with respect to religion (and gender) regarding applications and employees hired in its restaurants," and the consultant provides this information to the Equality Commission. McDonald's franchise holders provide this information to the Equality Commission separately and McDonald's Restaurants Ltd. does not receive copies of the monitoring reports. The company's franchisees also operate under agreements that require them "to comply with local laws."

McDonald's says that it advertises all openings publicly, and notifies all employees of positions open to internal applicants. It advertises openings in local and regional newspapers, government job markets, and the Internet. The company uses job markets in particular areas when it conducts affirmative action, and also has conducted what it dubbed "communications sessions" with restaurant staff on this subject. McDonald's does not use panels with more than one person to interview job candidates, as is generally recommended by fair employment experts, but all staff involved in candidate selection have received EEO training. The company also reviews the religious composition of applicant pools and new hires to determine community success rates, which can be an important check to ensure no bias has crept into the selection process. The company says all promotions are based on merit, and that training is non-discriminatory. The company's UK diversity policy specifically states that in Northern Ireland, it will "aim to make sure that no job applicant or existing employee is treated less favorably on the grounds of their political opinions," and that discrimination on setting standards [that] some employees are less likely to be able to achieve because of their political opinions" constitutes indirect discrimination.

Managers "are held directly responsible for adherence to the diversity policy," the company says. The company describes at some length these responsibilities, saying managers must "challenge questionable behavior and practices" and manage "their teams to create work environments where all employees are valued." Senior management at the company has overall responsibility for enforcing the company's diversity policy, and the human resources department "regularly monitors and reviews the policy to determine the need for additional action to ensure compliance," McDonald's told the Northern Ireland Service. The policy was last updated in December 2003.

Underrepresentation analysis: Protestants appear to be underrepresented in the work force, even when the presumably youthful work force is taken into consideration. If it is assumed that managers at McDonald's range in age from 25-34, the Catholic catchment area grows from 42.7 percent for all of Northern Ireland to 46.1 percent for this age group. Even so, Protestants appear to be underrepresented when compared to either catchment area.

Catholics account for more than 60 percent of the work force at the franchise operations, far exceeding the ideal estimate of between 42 and 46 percent.

According to more specific data provided by the company in 2005, Catholics made up 61 percent of McDonald's managers, even though the appropriate figure as compared to the catchment area is around 46 percent. Catholics also made up 53.5 percent of the personal service workers whose religion was identified at the company, slightly exceeding the expected 49.6 percent figure generated from census data for workers currently aged 16 to 24. This group of employees accounted for 62 percent of the work force in 2005, while managers accounted for nearly all the remaining employees.

In 2005, Protestants also appeared underrepresented among applicants and new hires for personal service occupations at the company. In 2005, the company had 359 applicants whose religion was identified, 63 percent of whom were Catholics. Catholics also made up 66 percent of the 125 employees hired. The company may need to examine its recruitment practices to encourage Protestant applicants.

Conformance with MacBride principles: The company says its policies reflect the fair employment policies embodied in the MacBride principles and that it will respond in full to the Northern Ireland Service fair employment survey. McDonald's Restaurants Ltd. distributes its diversity policy to all franchisees in Northern Ireland, and says it strongly encourages the franchisees "to adopt such a policy as their own for their restaurants." It is unclear how this policy is enforced at the franchise restaurants or how many franchisees have adopted it, but McDonald's Restaurants Ltd. conducts an annual business review of each franchise restaurant to determine "expandability of each franchise holder," and as part of this assessment, "an in-depth assessment of various people practices is conducted, including the diversity policy and a determination as to whether the franchise holder has had any serious employment relations issues in the past year."

Affirmative action outreach - McDonald's told the Northern Ireland Service that its administrative officer for Northern Ireland will attend a training course in affirmative action held by the Equality Commission. The company also notes that managers "are held directly responsible for adherence to [the] diversity policy." It is not undergoing any other affirmative action measures. McDonald's may want to look carefully at its recruitment flows, site by site, to determine if it is attracting a sufficient number of Protestant applicants.

Grievances - McDonald's Restaurants Ltd. had a grievance filed against it at the Fair Employment Tribunal; it was dismissed in December 2004. Company policy states that grievances may be brought to several levels of managers at the company and employees may be fired for violating the company's diversity policy.

• Cobain Mark t/a McDonald's Glengormley

Location	Belfast	
Business	fast food	
Employees	(Data as of 2007)	
	Protestant	0.00%
	Catholic	00.00%
	Other	
	<hr/>	
	Total	41

• Connan Paul Ltd.

Location	Dundonald and Belfast	
Business	fast food	
Employees	(Data as of 2007)	
	Protestant	57 30.80%
	Catholic	128 69.20%
	Other	37
	<hr/>	
	Total	222

• Dunluce Restaurants t/a McDonalds

Location	Coleraine
Business	fast food
Employees	(Data as of 2007)

Protestant	37	61.70%
Catholic	23	38.30%
Other	6	
Total	66	

Grievances -One grievance was filed against the company and several managers in March 2004. Dunluce Restaurants settled the claim in 2006.

- **JMC Restaurants t/a McDonald's Sprucefield**

Location	Lisburn	
Business	fast food	
Employees	(Data as of 2007)	
	Protestant	45 57.00%
	Catholic	34 43.00%
	Other	7
	Total	86

- **Rahon Enterprises t/a McDonald's**

Location	Bangor	
Business	fast food	
Employees	(Data as of 2007)	
	Protestant	86 42.60%
	Catholic	116 57.40%
	Other	11
	Total	213

- **S & S Restaurants t/a McDonald's Restaurant**

Location	Newry	
Business	fast food	
Employees	(Data as of 2007)	
	Total	53

Merck

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Sep-2002	Affirmative Action	NA	FET Settlements	0

• Merck Sharp & Dohme

Location	sales people work from home		
Business	sales		
Employees	(Data as of Feb. 2008)		
	Protestant	10	59.00%
	Catholic	7	41.00%
	Other	0	
	Total	17	

2009 Survey Response: None

Available information: Merck has for years maintained a small pharmaceutical sales force in Northern Ireland, which in 2004 grew to 16 workers. The company hired an additional employee in 2006. The company has been responsive to the Northern Ireland Service survey and has described its policies and work force breakdown for the last several years.

Compliance with NI fair employment law and Code of Practice: Company managers attend standards training as an active step to implement MacBride principles. The company registered with the Equality Commission in 2002 and began to monitor the community background of its existing employees, as required by Northern Ireland fair employment law. The company previously had not been subject to the requirements of the law given its small size. The company has said that it is "fully committed to fostering a diverse work force," and that its worldwide code of conduct "is reinforced through mandatory employee training at all levels." The company code "includes a statement on the company's commitment to the fair treatment of all employees," a commitment that includes "subsidiary non-discrimination policies."

Underrepresentation analysis: The Northern Ireland Service does not statistically assess companies with fewer than 30 employees. However, the employee breakdown at Merck is reflective of the community breakdown in Northern Ireland.

Conformance with MacBride principles: Merck says that its policies reflect the principles as amplified. In September 2002, Merck said that it is "committed to taking lawful steps in good faith to conduct business in Northern Ireland in accordance with the MacBride principles that are applicable to our particular situation." The company reached its agreement after inquiries from the State of Connecticut, which is obligated to sell stock in firms in which it holds stock unless the company agrees to implement the principles.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal.

Microsoft

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2006	Affirmative Action	NA	FET Settlements	0

• Microsoft

Location	Belfast		
Business	software		
Employees	(Data as of Aug 2008)		
	Protestant	10	56.00%
	Catholic	9	44.00%
	Other	0	
	Total	19	

2009 Survey Response: None

Available information: Microsoft provided the Northern Ireland Service with a copy of its fair employment monitoring return in 2005 and has completed the survey in each of the past three years. The company opened new premises in Belfast in September 2004. Invest Northern Ireland contributed £168,000 of the total investment of £700,000. In 2006, the company passed the 11-member work force threshold requiring it to register with the Equality Commission and submit annual monitoring returns.

Compliance with NI fair employment law and Code of Practice: The company's policies appear to adhere to fair employment laws in Northern Ireland. Employees are always notified of job openings, which are publicly advertised in the Belfast Telegraph, the Internet and the company intranet. The company does not systematically use interview panels, which is not surprising given the small work force. It also does not train those involved in candidate selection on EEO issues (although they are trained on the MacBride principles and diversity).

Microsoft has said it has a "total commitment to fair employment in Northern Ireland."

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees. However, both communities appear to be fairly represented at the company.

Conformance with MacBride principles: The company has not received a shareholder resolution asking it to comply with the MacBride principles, but in its 2006 survey response it reported that its policies comply with the principles and it agreed to complete the Northern Ireland Service annual survey. Microsoft also reported that it educates all recruitment and hiring managers on the MacBride principles.

Affirmative action outreach - No affirmative action measures appear warranted: however, Microsoft places an EEO statement in its advertisements and it conducts recruiting efforts in local schools.

Grievances -No complaints have been filed against Microsoft at the Fair Employment Tribunal. The company has a disciplinary procedure and a grievance procedure that provide a clear framework on how to deal with employee complaints. Workers can raise issues with someone other than their immediate supervisor and a co-religionist if desired; they can also file complaints confidentially. Offenders will be dismissed for gross misconduct or for lesser misconduct that is not corrected. The grievance procedure has an informal and a formal track as well as an appeals process.

Nacco Industries

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1991	Affirmative Action	Yes	FET Settlements	1

• Nacco Materials Handling

Location	Craigavon, Co. Armagh		
Business	industrial fork lift trucks		
Employees	(Data as of Aug. 2007)		
	Protestant	414	57.00%
	Catholic	309	43.00%
	Other	25	
	<u>Total</u>	<u>748</u>	

2009 Survey Response: None

Available information: The company had consistently responded to monitoring by the Northern Ireland Service, though it did not respond in 2008 or 2009. Service staff interviewed company officials in the 1990s. In June 2003, the company announced a £33 million investment to make the Craigavon facility a dedicated manufacturing center for a range of trucks with advanced engines and more sophisticated electronics. The company has been making forklifts in Northern Ireland since 1980. In 2008, the Portadown Times reported that around ninety jobs were at risk at Nacco Materials Holdings. The employers were told that it was due to a reduction of orders in United States. The management was said that it believes that its factory was overstaffed. About 120 temporary employers were already been laid off by Nacco. Kieran Lavery, senior shop steward, said that the union and the management are in cooperation regarding the issue.

Compliance with NI fair employment law and Code of Practice: Nacco's policy calls for including equal opportunities responsibilities in the written job descriptions of managers and supervisors, and for the maintenance of an employee training program on EEO matters. Harassment is an offense that can be cause for dismissal. Separate policies exist for harassment and victimization. Nacco audits its employment procedures annually, ensures that written descriptions exist for all posts, and says that redundancy procedures are "appropriate and justifiable." Two trained staff conduct short listing and interviews, records of decisions are kept at each personnel stage, cross-community representation occurs where possible on selection panels, and managers conduct exit interviews to obtain leavers' views on EEO at Nacco. Supervisors must also debrief all parties to complaints.

Nacco's employee guide concerning harassment and its EEO policy are written up in considerable detail in an easily accessible format. The EEO policy in particular, a 21-page booklet, contains clear instructions for employees on what constitutes harassment and how to begin resolution of a concern or complaint. The policy is more detailed and presented in a clearer format than most other EEO policies of U.S.-connected firms in Northern Ireland.

As part of an affirmative action agreement it reached with the FEC/Equality Commission after its triennial policy review in late 1997, Nacco revised its personnel practices to ensure they comply with the Code of Practice. Nacco provided equal opportunity awareness sessions and anti-harassment training for all employees.

In 1997, the company began using a pool of temporary employees who work according to production demands. "This has provided greater job security for our core (permanent) work force," Nacco said. The company's use of temporary workers does not appear to raise any particular fair employment concerns; these workers are covered by the company's equal opportunities and grievance policies.

Underrepresentation analysis: Both communities appear to be fairly represented in the Nacco's work force. In the past, Catholics appeared to be underrepresented among plant and machine operatives and the work force as a whole. Applicants and new hire figures also show fair representation of both communities. Managers, professionals, sales associates and skilled workers were compared to a recruitment area and included all of Northern Ireland, while the rest of the work force was compared to the Craigavon travel-to-work area. Plant and machine operatives make up

about three-quarters of the staff at Nacco. There have not been any redundancies in the past three years.

Conformance with MacBride principles: Nacco reached an agreement with shareholder proponents of the MacBride principles in 1991. It says it "is making all lawful efforts to implement the fair employment practices embodied in the MacBride principles."

Affirmative action outreach - In 2005, Nacco achieved its original affirmative action plan goals to boost the Catholic proportion of applicants and new hires to not less than 45 percent. Catholic applicants were just shy of the 45 percent benchmark in the most recent monitoring period, but among new hires Catholics accounted for about 56 percent. This goal has come five years later than expected. The company had pledged to actively target the Catholic community in job advertisements; its employment ads include welcoming statements for both communities. The company also has developed links with schools, training schemes and organizations that serve the Catholic community. Nacco worked particularly hard at developing an outreach program to schools, including providing work experience, mock interviews and factory tours. Several years ago, Nacco explained that its ability to practice affirmative action measures was limited by its minimal recruitment, which proved to be the case when Catholic representation has grown along with recruitment in 2004 and 2005. Since then, staff levels have declined slightly.

Grievances -Four complaints have been filed against the company since 2003. One complaint was settled, two were withdrawn and one was dismissed. The company adopted a new grievance procedure in 1998. As noted above, the policy booklet for employees is highly approachable and clearly laid out. Employees may call an outside help line 24 hours a day to obtain confidential counseling about their concerns.

NTL

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Apr-2008	Affirmative Action	NA	FET Settlements	0

- **Virgin Media**

Location	Belfast		
Business	Media		
Employees	(Data as of July 2008)		
	Protestant	62	63.30%
	Catholic	36	26.70%
	Other	7	
	Total	105	

2009 Survey Response: None

Available information: In January 2007, NTL and Virgin Mobile combined to form Virgin Media. NTL merged with television and phone provider Telewest in March 2006 and subsequently acquired Virgin Mobile in July. Job cuts were announced after both transitions and the Northern Ireland staff is less than half of what it was in 2005. The company now employs 105 workers. The mergers brought together different services and the newly rebranded Virgin Media can now offer cable TV, broadband Internet access, fixed telephone and mobile phone service.

NTL emerged from bankruptcy after a reorganization of its operations in 2002. The company was split into two firms--NTL UK and Ireland and NTL Euroco. Bondholders ended up with all the equity in the company's UK and Ireland unit and 86 percent of NTL Euroco. The reorganization caused NTL to shed 2,000 jobs in 2004, according to press reports, but this did not seem to affect its Belfast operations where employment dropped by only three jobs. Overall employment at the company in Belfast fell to 247 in October 2004, down from a high of nearly 500 in 2000; it had grown rapidly between 1996 and 2000.

Compliance with NI fair employment law and Code of Practice: Virgin Media reports that it complies with Northern Ireland fair employment law. The company uses an EEO statement in all public ads. The company tries to ensure that both communities are represented on interview panels. Virgin Media submits annual reviews to the Equality Commission in addition to its triennial policy reviews, as required by the fair employment law.

Underrepresentation analysis: Overall, both groups appear to be fairly represented compared to the population of Belfast, where the company is based. Catholics are slightly underrepresented among associate and professional employees and underrepresented among senior managers and sales people; however, the actual number of employees in these categories is small enough to make this underrepresentation statistically insignificant.

Conformance with MacBride principles: Virgin Media agreed with the State of Connecticut in 2008 to comply with the MacBride Principles.

Affirmative action outreach - No affirmative action measures appear warranted and none are in place.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal. Regarding an earlier complaint, NTL told the Northern Ireland Service, "The individual was dismissed after the company had followed through all stages of its disciplinary procedure, as a result of the associate's poor sales performance. The claim [was] one of unfair dismissal and religious discrimination." The company's standard grievance procedure allows employees to communicate complaints to someone other than a direct supervisor, and as needed to a person of the same religious background.

NYSE Euronext

MacBride Agreement	Awaiting company response	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• NYSE Technologies

Location	Belfast		
Business	computer software and development		
Employees	(Data as of 2007)		
	Protestant	34	47.20%
	Catholic	38	52.80%
	Other	5	
	Total	77	

2009 Survey Response: None

Available information: NYSE Technologies was originally known as Wombat Financial Software, and was acquired by the NYSE in 2009. The company began operations in Northern Ireland in early 2004 with a small software development office in the university district in south Belfast, growing to 34 workers in early 2006 and 77 in 2007. Wombat Financial had an agreement to abide by the MacBride Principles; in 2009 the company told the Northern Ireland Service that its Belfast operations had been acquired by NYSE Euronext. NYSE Euronext has not yet responded to the Northern Ireland Service's request for information.

Compliance with NI fair employment law and Code of Practice: Wombat, NYSE Technologies' original parent, reported in 2007 that its policies adhere to fair employment laws in Northern Ireland, although it did not provide the Northern Ireland Service with any copies of these policies.

Underrepresentation analysis: Using all of Northern Ireland as a catchment area--appropriate given the high-tech nature of NYSE Technologies' operations--neither group appears to be underrepresented.

Conformance with MacBride principles: NYSE Euronext has not yet responded to the Northern Ireland Service's inquiries, first begun in December 2009.

Affirmative action outreach - No affirmative action measures are warranted.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal.

Office Depot

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	May-2006	Affirmative Action	No	FET Settlements	0

• Office Depot International Ltd.

Location	Belfast
Business	office supplies
Employees	(Data as of 2007)
	Total 29

2009 Survey Response: None

Available information: The company has had between 28 and 34 employees working at its Belfast office supplies store for the last six years. Office Depot responded to the Northern Ireland Service survey in 2005 and 2006, but has not responded since.

Compliance with NI fair employment law and Code of Practice: The company reports that its policies are in line with the Code of Practice. Managers at the Northern Ireland operations oversee the company's equality policy, ensuring procedures are in line with standards issued by the Equality Commission. Site managers report to the Director of Human Resources who produces an annual report on EEO programs for the UK and Ireland management board as well as the Vice President of Human Resources Europe. Office Depot does not always publicly advertise available positions at the company, but it does notify all employees. It uses the Belfast Telegraph, the Internet and the company intranet to advertise positions and it always ensures interview panels are comprised of members of both communities. Interviewees are not required to undergo EEO training and the company does not systematically review the community composition of the applicant pool. Office Depot reports that its redundancy policy "clearly states clear selection criteria for redundancy selection that is objective and non-discriminatory."

Underrepresentation analysis: Fewer than 10 of the 29 employees at Office Depot International are Roman Catholics. In 2006, the last year for which full data are available, one-third of 24 employees with known community affiliation were Catholic, precisely in line with the 37.1 percent Catholic catchment area for the company. Office Depot employs workers in two job categories, sales associates whose recruitment area includes all of Northern Ireland and machine operatives whose more narrow recruitment area is the Belfast travel-to-work region.

Conformance with MacBride principles: In May 2006, the company indicated its policies were consistent with the MacBride principles. It also agreed to respond to further monitoring inquiries. To ensure compliance with the MacBride principles, the company reports that "all senior and line management within the company are fully trained in the company respect and dignity in the workplace policy. All management also attends the company's strategic leadership program, which is a recognized accreditation and managing diversity in the workplace is a topic that is given serious consideration."

Affirmative action outreach - No affirmative action appears to be warranted. The company places an EEO statement in its employment advertisements.

Grievances -No fair employment grievances have been filed against the company at the Fair Employment Tribunal.

Openwave Systems

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Sep-2004	Affirmative Action	Yes	FET Settlements	0

• Openwave

Location	Belfast		
Business	telecommunications software		
Employees	(Data as of 2008)		
	Protestant	36	36.70%
	Catholic	62	63.30%
	Other	12	
	Total	110	

2009 Survey Response: None

Available information: After a November 2000 merger with Software.com, the company changed its name from Phone.com to Openwave Systems. Openwave is a California firm whose software enables Internet access through wireless telephones, and it acquired Apion Ltd., based in Belfast, in October 1999. Apion was formerly the privately owned subsidiary of Aldiscon, a Dublin-based company, which entered Northern Ireland in 1995. Openwave's software is known in the business as WAP (wireless applications protocol), and the investment in Northern Ireland marks its first product development center located outside Silicon Valley. Openwave has regularly responded in full to the Northern Ireland Service fair employment surveys. Local managers met with the Service in 2003 and 2000.

Compliance with NI fair employment law and Code of Practice: The company says it complies with Northern Ireland fair employment law and with the Code of Practice. Openwave advertises in the Belfast Telegraph and the Newsletter, both typically Protestant papers. The company also uses the Internet and its intranet. It sends reminders of job openings by email to all staff members. A panel of two interviewers assesses candidates, who attend two interviews before receiving an offer, being assessed by four people in all. Openwave tries to ensure that both communities are represented on its interview panels, but it admits that it is often difficult to do so given its size. All those with the authority to make hiring decisions attend anti-discrimination training using materials from the Equality Commission. The company also provides training on harassment and anti-discrimination for all employees during their orientation.

Openwave published a formal process for promoting employees in August 2003. The policy calls for promotion based solely on performance. This policy is global in scope, though it does conform to Northern Ireland code of practice in that it is based on established criteria and all employees are eligible to apply for promotions. Company representatives told the Northern Ireland Service in 2003 that its career tracks are published on the company intranet. The company publishes its equal opportunity policy and its harassment policy in the employee handbook; both policies are modeled after standard policies under European employment law, as well as on model policies published by the Equality Commission.

Underrepresentation analysis: Protestants are underrepresented in the work force overall and among managers and associate professionals. The company did not indicate what it considers to be an appropriate catchment area for its employees, apart from noting that managers and professionals are recruited from all areas within Northern Ireland and the United Kingdom.

As a high-tech company, Openwave has encountered a shortage of qualified workers in Northern Ireland. The company notes that nearly all of its employees are highly educated, including those who work in clerical positions. The Northern Ireland Service compared managers, professionals and sales associates to all of Northern Ireland and associate professionals and administrative staff to the Belfast travel-to-work area. This comparison put the ideal Protestant representation at about 66 percent, but their portion of the work force at Openwave is less than 40 percent.

Conformance with MacBride principles: In September 2004, the company reached an agreement with the New York City pension funds on compliance with the MacBride principles, after the funds

proposed a shareholder resolution on the subject. Openwave affirms each year in its survey response that its policies reflect the principles and it will comply with monitoring by the Northern Ireland Service.

Affirmative action outreach - In 2004, Openwave reported that it had updated its existing affirmative action agreement with the Equality Commission. Two years later, when asked whether the it reached an affirmative action agreement, it responded that the question was not applicable to Openwave. The status of the affirmative action plan mentioned in previous years is unclear and the company has not make any progress towards boosting the percentage of Protestants in the work force, even though it annually hires staff for positions in the association professional category.

Nevertheless, Openwave does make use of some affirmative action measures. The company places EEO statements in job postings. The company has discontinued a scholarship program that used to target Protestant schools for applicants for financial reasons. It does, however, maintain links at universities in Scotland and England, recognizing that young Protestants from Northern Ireland frequently study there, and it also conducts other outreach at local Protestant schools that aims to attract more Protestant and female applicants. The company tracks applicants' community affiliation in accordance with Northern Ireland fair employment requirements.

The company's policy on affirmative action states: "Where appropriate, lawful positive action measures such as special encouragement in advertisements will be used. These measures are available to us in certain circumstances, for example, where there is an underrepresentation of a particular group in specific areas of work. It should be emphasized, however, that selection for employment or internal selection for a new role will always be on merit. Selection based on a person's gender, religion or race constitutes unlawful discrimination--even if that group is currently underrepresented within the company or within a particular job function."

Any affirmative action efforts the company might consider should be aimed at increasing the number of Protestants among managers and associate professionals.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal.

Oxford Industries

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2006	Affirmative Action	?	FET Settlements	0

• Sherman Ben (Manufacturing) Ltd.

Location	Lurgan		
Business	garment manufacturers		
Employees	(Data as of 2007)		
	Protestant	30	43.50%
	Catholic	39	56.50%
	Other	3	
	Total	72	

2009 Survey Response: None

Available information: In 2004, Oxford Industries acquired Ben Sherman, a private British company founded in 1963 that designs, distributes and markets its brand of modern clothing to a youthful consumer market. The company's customer service, recruitment and accounts office is located in Craigavon, Northern Ireland. It employs 72 workers, a drop from the 130 workers on staff in 2005, and the 226 employees it had in 1996 when its Northern Ireland operations also included manufacturing. The company last responded to the Northern Ireland Service survey in 2006.

Compliance with NI fair employment law and Code of Practice: The company reports that its policies adhere to fair employment laws in Northern Ireland. The company always publicly announces open positions and it advertises them in the Belfast Telegraph, other local newspapers, job markets and specialized recruitment agencies. When selecting candidates, Ben Sherman occasionally uses an interview panel and always ensures that a representative from human resources is present. Senior management in Northern Ireland oversee the company's equality policy.

Underrepresentation analysis: Protestants are underrepresented at Ben Sherman when using a catchment area of the Craigavon travel-to-work area or Northern Ireland as a whole.

Conformance with MacBride principles: In 2006, the company reported that its policies reflect the spirit of the MacBride principles and it agreed to comply with monitoring by the Northern Ireland Service, but it has not responded to surveys since 2006.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -No fair employment grievances have been filed against the company. The company's grievance policy allows for employees to file confidential complaints and to raise issues with someone other than their direct supervisor, which may include a colleague of the same community background.

PepsiCo

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Mar-2006	Affirmative Action	?	FET Settlements	0

• Walkers Snacks Ltd.

Location	Antrim
Business	Crisps
Employees	(Data as of 2007)
	Total 31

2009 Survey Response: None

Available information: The company has a small operation that sells and distributes snacks, such as potato chips, in Northern Ireland. PepsiCo UK & Ireland began selling Walkers Crisps in Northern Ireland in 1997 through a third-party distributor, LMI. PepsiCo UK bought LMI's sales and marketing operations in 2003.

The company responded to the Northern Ireland Service survey in 2006, but has not responded since.

Compliance with NI fair employment law and Code of Practice: The company's policies adhere to the fair employment laws in Northern Ireland. In the company's Human Rights Workplace Policy, it says, "we comply with all applicable laws, regulations, and other employment standards, whenever we operate or work." The policy also includes the statement, "we do not tolerate discrimination and work to ensure equal opportunity for all associates."

PepsiCo also provided a copy of its Code of Conduct, which contains information on its grievance procedure and informs employees about methods they can use to address concerns. One method is the ethics hotline available toll free to all employees worldwide.

PepsiCo also provided details on its human resources procedures. The company notifies all of its employees when positions become available, but it does not publicly advertise all job openings. When it does widely advertise job availability, it uses the local newspapers, the Internet, trade publications and the company intranet. Walkers always uses an interview panel of employees who have been trained in EEO issues when selecting candidates, but it did not indicate if it seeks to ensure that both communities are represented on the panel or whether it examines applicants' backgrounds to determine success rates by community. This practice is often used by companies to make sure the candidate selection process is not biased. When redundancies are necessary, the company uses performance selection criteria or specifies the role that will be eliminated. When selecting employees for promotion, the company evaluates skill sets, performance criteria, future potential and personal development goals. Training opportunities are based on providing specific skills to those whose roles are suited for the skill set.

Underrepresentation analysis: In 2007, fewer than 10 of the company's 31 employees were Protestant. Antrim, where the company's facility is located, is 38.5 percent Catholic, meaning that even if the maximum number of nine of the company's employees are Catholic, Catholics are underrepresented, though not to a statistically significant degree. In 2006, the last year for which full data are available, Catholics made up 40 percent of the company's workforce.

Conformance with MacBride principles: The company agreed in spring 2006 that it would cooperate with monitoring of its operations in Northern Ireland and said that its policies comply with the MacBride principles. It completed the Northern Ireland Service survey in 2006 but not thereafter.

Affirmative action outreach - No affirmative action measures appear warranted at this time. The company reported that it will be completing a review with the Equality Commission this year and will work with the Commission on any needed affirmative action measures.

Grievances -No fair employment grievances have been filed against the company at the Fair Employment Tribunal. The company has grievance procedure that lays out the steps for employees to take if there is an issue they want addressed. Employees can raise issues with their immediate supervisor or the next-level manager. The policy outlines a clear timeframe to handle grievances and

informs employees that a colleague and/ or a representative from human resources may assist them in this process.

Pfizer

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	May-2000	Affirmative Action	NA	FET Settlements	0

• Pfizer UK

Location	employees work from home		
Business	pharmaceutical sales/ animal health sales		
Employees	(Data as of 2007)		
	Protestant	15	51.70%
	Catholic	14	48.30%
	Other	9	
	Total	38	

2009 Survey Response: None

Available information: Pfizer has usually responded in full to the annual Northern Ireland Service surveys since 2000, giving a breakdown of its employees by religion and providing fair employment policy information, although the company did not complete a survey in 2007 and submitted only a partial response in 2008. Until 1999, the company's work force hovered around 10 employees. In 2003, Pfizer acquired Pharmacia, which had fewer than 10 employees in Northern Ireland. The company only employs sales representatives, who work from home and report to a subsidiary in England.

Compliance with NI fair employment law and Code of Practice: Pfizer says its employment and recruitment policies and practices are "standard throughout the world, with modifications designed to tailor them to local laws and conditions." The company has adopted the Code of Practice and adheres to the Fair Employment and Treatment (Northern Ireland) Order 1998. Pfizer also has an "Equal Opportunity Code of Practice," which it observes when recruiting in Northern Ireland and elsewhere. Pfizer started monitoring the religious composition of its work force in Northern Ireland in 2000.

Pfizer says it publicly advertises all openings, on the Internet, on its own intranet and in local and regional newspapers. It receives all of its applicants from recruitment agencies, which prescreen the applicants and forward them to Pfizer. The company appears to have standardized selection procedures. It always uses an interview panel comprised of employees who have received EEO training, but both communities are not necessarily represented on the panel. Prospective employees must undergo a competency-based group interview with a sales role-play exercise. A panel of managers makes all hiring decisions. The company sometimes examines applicant success rates by community affiliation. Promotion is based on merit, and fair employment monitoring ensures employee participation in training programs is equitable. The company has had only one redundancy in the last several years. It says that its redundancy policy is in accordance with its equal opportunities standards. Responsibility for fair employment is shared by Northern Ireland senior management, UK management, corporate headquarters and the corporate board.

Underrepresentation analysis: Neither Catholics nor Protestants appear to be underrepresented at the company when its employees are compared to all of Northern Ireland, the area from which the company draws its workers. Pfizer has a Catholic representation of 48 percent, exceeding the 42.7 Catholic catchment area for all of Northern Ireland, but not so far out of line as to have an underrepresentation of Protestants, given its small size.

One case filed against the company at the Fair Employment Tribunal was dismissed.

Conformance with MacBride principles: The company reached a MacBride implementation agreement in 2000. The company agreed to cooperate with monitoring by the Northern Ireland Service and to take steps as applicable to implement the MacBride principles. Many of the principles are not applicable given that employees work from home. Pfizer uses its training in equal opportunity/discrimination/harassment issues to communicate the standards embodied in the MacBride principles to its managers.

Affirmative action outreach - Affirmative action measures do not appear warranted.

Grievances -The company's grievance policy stipulates that employees may direct any complaints of discrimination or harassment to their supervisors, Human Resources managers or any other appropriate senior-level person. Pfizer will accommodate employees who wish to voice their complaint to a co-religionist. A grievance filed against the company in 2007 is pending.

Pitney Bowes

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1990	Affirmative Action	NA	FET Settlements	0

• Pitney Bowes Ireland

Location	Belfast		
Business	sales and service of mailing and paper handling equipment		
Employees	(Data as of 2008)		
	Protestant	4	55.00%
	Catholic	5	45.00%
	Other	1	
	<u>Total</u>	<u>10</u>	

2009 Survey Response: None

Available information: Pitney Bowes regularly completes the Northern Ireland Service survey.

Compliance with NI fair employment law and Code of Practice: Pitney Bowes does not have a fair employment code geared specifically to Northern Ireland, relying instead on the company's worldwide policy and the UK policy geared to race and sex discrimination law. The detailed policy covers many of the points raised in the Code of Practice, however, and company practices appear to conform to the recommendations of the Code, which Pitney Bowes says it follows. Pitney Bowes has consulted with the Equality Commission on proper procedures. Employees are always notified of available positions, which are publicly advertised in the Belfast Telegraph, the Internet and in local and regional newspapers and through employment agencies. Interviews are formally structured, an EEO statement is used in ads and employees involved in selection have received EEO training. Pitney Bowes reviews the religious composition of its applicant pool to determine success rates by community. Local and regional management share responsibility for supervising fair employment policies, and an equal opportunities group within Pitney Bowes meets to address relevant issues.

Underrepresentation analysis: The Northern Ireland Service does not make a definitive statistical assessment on a work force with fewer than 30 employees. However, both communities appear to be fairly represented at the company.

Conformance with MacBride principles: Pitney Bowes reached an agreement on MacBride implementation in 1990. The company says that it "continues to make all lawful efforts to implement the fair employment practices embodied in the MacBride principles."

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -No fair employment grievances have been filed against the company in recent years. Pitney Bowes paid £25,000 to resolve the complaint that involved racial as well as religious discrimination allegations in 2001. The company did not indicate if the case prompted it to reexamine any of its policies. The company has an extensive grievance policy specifically aimed at complaints of discrimination. Employees first contact their immediate manager, but also may raise concerns with managers further up the chain of command or with the human resources department. Employees can also file confidential complaints, raise grievances with a colleague of the same background and seek assistance from the in-house union representative.

PPG Industries

MacBride Agreement Agreement Date	No	Underrepresentation Affirmative Action	Yes No	FET Discrimination Findings FET Settlements	0 1
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- SigmaKalon**

Location	8 locations province-wide
Business	Coatings and decorative Paints
Employees	(Data as of 2007)
	Total 68

2009 Survey Response: None

Available information: On Jan. 2, 2008, PPG Industries completed the acquisition of SigmaKalon Group, from Bain Capital. Previously, Bain Capital acquired SigmaKalon UK Ltd. from Total, the French oil company, in February 2003. Bain Capital has previously never responded to RiskMetrics' surveys on SigmaKalon's operations in Northern Ireland. SigmaKalon sells its products through decorating centers. The work force has been about the same size in Northern Ireland for the last several years, growing by just a few employees. The company provided no information on its fair employment policies. The company has not reached any agreement on compliance with the MacBride principles. No discrimination complaints have been filed against the company at the Fair Employment Tribunal in Belfast as of August 2009.

Underrepresentation analysis: Equality Commission data indicates that in 2007 and 2006, fewer than 10 of SigmaKalon's employees were Catholic. (When there are fewer than 10 Catholic or Protestant employees, the Commission does not publish detailed work force information.) In 2004 and 2005, Equality Commission data showed 10 Catholic employees and four employees with no known religious affiliation. If SigmaKalon lost only one Catholic employee and retained the same number of Protestant employees, 14 percent of employees would be Catholic--a clear underrepresentation in light of the fact that the company's facilities are located throughout Northern Ireland, where 42.7 percent of the population is Catholic.

Affirmative action outreach - The Northern Ireland Service does not have any information about an affirmative action program at SigmaKalon.

PriceWaterhouseCoopers

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• PriceWaterhouseCoopers

Location	Belfast and five other locations		
Business	accounting services		
Employees	(Data as of 2007)		
	Protestant	419	55.90%
	Catholic	330	44.10%
	Other	78	
	<u>Total</u>	<u>827</u>	

2009 Survey Response: None

Available information: The company has never responded to inquiries from the Northern Ireland Service, which is somewhat ironic as it is in the forefront of firms that are monitoring employment practices in developing countries for concerned U.S. investors. Aside from the company's headquarters in Belfast, the company's website lists another five offices throughout Northern Ireland-- Armagh, Dungannon, Londonderry, Omagh and Portadown. Equality Commission monitoring information shows significant fluctuations in work force size, from 634 in 2003 to 122 in 2004 to 827 in 2007. In 2009, the company cut its salaries to employees by 10 percent, as part of a series of initiatives in an effort to avoid redundancies.

(RTE News, 02/25/2009)

Compliance with NI fair employment law and Code of Practice: The company has not provided any information on its employment practices in Northern Ireland.

Underrepresentation analysis: Neither Catholics nor Protestants appear to be underrepresented at the company overall when the work force is compared to Northern Ireland as a whole, which is probably the best comparison given the professional nature of most jobs at the company.

Conformance with MacBride principles: The company has no agreement on implementation of the MacBride principles with proponents of the code, but as a private firm also has not received any requests for such action. Shareholder proposals to public companies are the usual route to an agreement.

Affirmative action outreach - Apparently not applicable.

Grievances - Since 2003, one complaint has been filed against the company at the Fair Employment Tribunal.

PubliCARD

MacBride Agreement Agreement Date	No	Underrepresentation Affirmative Action	No ?	FET Discrimination Findings FET Settlements	0 0
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• Infineer Ltd.

Location	Bangor, Co. Down
Business	access control technology (smart cards)
Employees	(Data as of 2007)
	Total 25

2009 Survey Response: None

Available information: PubliCARD responded to the Northern Ireland Service fair employment survey for the first time in 2002, and indicated in 2004 that its profile was still accurate, without updating employee data. It has not responded since then. In the 2007 monitoring period, the number of employees at Infineer fell below 26.

Compliance with NI fair employment law and Code of Practice: The company reports that its operations adhere to Northern Ireland fair employment law and the Code of Practice. The company's financial controller supervises the company's EEO programs. It publicly advertises all job openings, placing ads in the Belfast Telegraph, local and regional newspapers. PubliCARD includes EEO statements in its ads. The company does not always notify all employees of positions open to internal applicants. It never uses an interview panel when interviewing job candidates, and those involved in candidate selection sometimes, but not always, receive training on EEO issues. The company sometimes reviews the religious composition of applicant pools and new hires to determine success rates by community.

Underrepresentation analysis: The Northern Ireland Service does not assess the demographics of workplaces with fewer than 30 employees.

Conformance with MacBride principles: The company has never received a shareholder resolution asking for implementation of the MacBride principles, the usual route to an agreement with activists. Its survey response indicated that its policies do not currently reflect the MacBride principles and that it is not prepared in the future to implement policies that reflect the MacBride principles, and it provided no explanation about this response.

Affirmative action outreach - It is unclear if affirmative action measures are warranted or if the company has implemented any.

Grievances -No discrimination complaints have been filed against the company at the FET. The company says that it deals with complaints of discrimination based on religion or political views through its normal grievance procedure.

Raytheon

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

• Raytheon Systems

Location	Derry, Co. Londonderry		
Business	software development center		
Employees	(Data as of April 2006)		
	Protestant	11	30.00%
	Catholic	27	70%
	Other	0	
	Total	38	

2009 Survey Response: None

Available information: The company has sporadically responded to the Northern Ireland Service survey. In 2005 it provided updated employment figures and in 2006 it submitted a full survey response, but it did not respond in 2007 and submitted only partial information in 2008. Employment appears to have fallen short of initial goals, and the company announced in 2003 that there would be some redundancies. Raytheon's work force has remained steady for the last three years at slightly less than 40 workers. The company began recruiting senior personnel in the summer of 1999 for a software development center in Derry, Co. Londonderry. Some 15 jobs at Raytheon have gone to unemployed individuals, as part of the company's participation in the government's New Deal program aimed at putting the long-term unemployed back to work. Raytheon also bid successfully with Short Brothers Aircraft, the Belfast subsidiary of Canada's Bombardier, for a \$1.3 billion Ministry of Defense airborne standoff radar contract that will add up to 800 jobs at the Shorts facility in Belfast.

Some human rights activists oppose Raytheon's presence in Derry because it is a weapons manufacturer. The company says, however, that its facility in Northern Ireland only develops software and is not directly involved in arms production. Following the U.S.-led assault on Fallujah, Iraq, in November 2004, anti-war activists protested in Derry and announced plans to dig a symbolic grave outside the Derry plant.

Compliance with NI fair employment law and Code of Practice: The company provided the Northern Ireland Service with a copy of its fair employment policy in 2006, but has not provided a more recent copy. The company said it has a "systematic and objective recruitment policy, which ensures that applicants are selected solely according to merit." It alerts all employees to job opportunities, but it does not always publicly advertise them. When jobs are advertised, Raytheon uses the Belfast Telegraph, other local papers, the Internet, the company intranet and a recruitment agency. Personnel who select candidates for hire have received EEO and the company sometimes reviews its applicant pool to determine success rates by community. Managers occasionally consult with trade unions or other worker representatives on equality issues.

UK managers oversee the company's equality policy.

Underrepresentation analysis: Protestants have appeared to be slightly underrepresented in the past, but the most recent figures indicate both communities are fairly represented.

Conformance with MacBride principles: The company has not reached an agreement with shareholder proponents on the MacBride principles and has opposed shareholder resolutions asking it to implement the MacBride principles. Investors gave 10.1 percent support to a shareholder resolution asking for MacBride implementation at the company's 2004 annual meeting and 9.8 percent in 2005. The company says that the majority of the MacBride principles are included in Northern Ireland's fair employment laws and regulations, which it says "reflect the intent of the MacBride principles." In the most recent survey response, Raytheon reported that it would respond to further survey requests from the Northern Ireland Service.

Affirmative action outreach - No affirmative action steps are required.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal. The company reported that its grievance procedure allows employees to file confidential complaints and to raise complaints with someone other than an immediate supervisor, and it will accommodate requests to bring grievances to a co-religionist.

Regis Corporation

MacBride Agreement	Awaiting company response	Underrepresentation	No	FET Discrimination Findings	0
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Agreement Date		Affirmative Action	?	FET Settlements	0
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• Supercuts

Location	Belfast
Business	salon
Employees	(Data as of 2007)
	Total 27

2009 Survey Response: None

Available information: Supercuts has at least one location in Northern Ireland, in Belfast. The company did not respond to the Northern Ireland Service's survey.

Underrepresentation analysis: Although full data are not available, the Equality Commission reports that fewer than 10 Catholics are among Supercuts' 28 employees. Nine Catholic employees would comprise 32 percent of the company's work force and would not constitute underrepresentation when compared to the Belfast travel-to-work area. The Northern Ireland Service does not assess the demographics of workplaces with fewer than 30 employees.

Sally Beauty Holding, Inc.

MacBride Agreement	Awaiting company response	Underrepresentation ?	FET Discrimination Findings	0
Agreement Date	Sep-2005	Affirmative Action ?	FET Settlements	0

• Sally Hair & Beauty Supplies

Location	eight locations around the province		
Business	beauty shops		
Employees	(Data as of 2007)		
	Protestant	32	52.50%
	Catholic	29	47.50%
	Other	6	
	<u>Total</u>	<u>67</u>	

2009 Survey Response: None

Available information: Alberto-Culver spun off Sally Beauty Supply in November 2006. Sally Beauty has seven retail stores throughout Northern Ireland, including in Belfast (two locations), Newtownabbey, Portadown, Newry, Coleraine and Ballymena. The work force has grown from 31 employees in 2003 to nearly 70 workers in the most recent monitoring period.

Compliance with NI fair employment law and Code of Practice: Alberto-Culver reported that it alerts employees about its Equal Opportunities Policy in the employee handbook, but it did not provide copies of its policies to the Northern Ireland Service.

The company publicly advertises and alerts employees about all job openings, which are advertised in job markets, the Internet and the shop windows. Employees who select candidates for hire are trained in equal employment issues. The company does not always use interview panels and it never reviews the religious composition of applicants to determine success rates by community. Applicants are initially screened on their availability, eligibility and previous employment before they are scores on their skill level, retail knowledge and tenure. The interviewers examine six key principles when evaluating potential hires: customer satisfaction, self-management, coping with pressure, decision making, team player and retail affinity.

Underrepresentation analysis: Neither community appears to be underrepresented at Sally Hair. Of the 61 workers with identified community affiliation, 47.5 percent are Catholics. The best catchment area for this statistical comparison is the economically active population of Northern Ireland because the company's stores are peppered throughout the region. The Northern Ireland Service also compared Sally Hairs work force to a catchment area that is particular to the 13 store locations. This second area is 39.3 percent Catholic, slightly lower than the 42.7 percent portion of Catholic workers in all of Northern Ireland.

Conformance with MacBride principles: The company reached an agreement on MacBride implementation in September 2005, prompted by the New York City comptroller's office. Alberto-Culver reported that it relies on the district manager in Northern Ireland to monitor recruitment and employment decisions and employee relations, ensuring that the MacBride principles are implemented. The manager is supported by a territory manager and the human resources department "to ensure she receives full advice, guidance and training."

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal.

Alberto Culver reported to the Northern Ireland Service that its grievance procedure is in line with the statutory grievance procedure for the UK; it did not provide copies of its policies.

Schein (Henry) Inc.

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- **Henry Schein K.M. Ltd.**

Location	Belfast
Business	dental supplies
Employees	(Data as of 2009)
	Total 11

2009 Survey Response: None

Available information: The company last responded to the Northern Ireland Service survey in 2001. The company is still listed in the Northern Ireland phone book as having offices in Lisburn and Belfast and it appeared in the Equality Commission's most recent register of employers, indicating it has at least 11 workers; the company has fewer than 25 employees, however, as it does not appear in the commission's monitoring report. No information is available on the religious composition of the work force. As of 2001, the company's practices appeared to be in compliance with fair employment law and the Code of Practice and unlike some other small firms, the company does use an equal employment statement in its ads. Selection procedures appear systematic, although all staff involved in recruitment had not been trained on EEO matters. The company has not taken a position on the MacBride principles and reported that it is unsure if its operations adhere to the principles. It also has not received a shareholder resolution on this issue--the usual route for implementation agreements. The company's office in Belfast is easily accessible to both sides of the community. Schein said sectarian harassment and intimidation is "not tolerated in its office." No fair employment complaints have been filed against the company.

Seagate Technology

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2007	Affirmative Action	NA	FET Settlements	0

• Seagate Technology (Ireland)

Location	Derry and Limavady, Co. Londonderry		
Business	manufacture of disk drives; R&D		
Employees	(Data as of Oct. 2007)		
	Protestant	533	33.80%
	Catholic	1046	66.20%
	Other	139	
	<u>Total</u>	<u>1718</u>	

2009 Survey Response: None

Available information: Seagate was once the largest publicly traded U.S. employer in Northern Ireland; its work force is divided evenly between facilities in Derry and Limavady. The company was taken private in 2000 and then later went public again, incorporating in the Cayman Islands. In 2007, the company completed its first full Northern Ireland Service survey since 2000; the company also completed a full response in 2008.

Compliance with NI fair employment law and Code of Practice: Seagate said it "adheres to both the letter and the spirit" of fair employment law in Northern Ireland, and to the Code of Practice. The company's fair employment policy and practices appeared to be consistent with the Code of Practice--but the company never provided copies of any policies to the Northern Ireland Service. Management several years ago was familiar with the Code and its requirements and appeared to take fair employment issues seriously. Seagate reported in 1999 that it advertised jobs in the local Protestant and Catholic papers in Derry and advertised upper level jobs in the Belfast Telegraph and the British mainland press. The company includes EEO statements in its ads and specifically welcomes Protestants in ads that recruit managers and administrators.

Underrepresentation analysis: Protestants appear to be underrepresented when comparing Seagate's work force to to the Londonderry travel-to-work area, which includes the district council areas of Londonderry and Limavady, where the company's facilities are located.

The proportion of Protestants has grown in fits and starts from the time the company opened in Northern Ireland; they accounted for only 21 percent of the work force in 1996, reached almost 31 percent in 1998, fell to 28 percent in 2006 and rose substantially to the present level of nearly 34 percent.

The company's Derry location in the Springtown Industrial Estate, on the mainly Catholic west bank of Derry's River Foyle, may make it difficult for the company to recruit Protestants to that location. Trade unionists familiar with the area, however, have told the Northern Ireland Service that Protestants would not have difficulty traveling to the facility.

Conformance with MacBride principles: Seagate said its "employment practices are generally in line with the spirit of the objectives outlined in the MacBride principles." The company added, however, that while it is "committed to providing a safe and secure workplace, we cannot guarantee the safety of our employees away from work. Also our employment decisions are based on needs, skills, and other criteria to the exclusion of religious affiliation." Fair employment law in Northern Ireland does allow companies to take steps during layoffs to protect affirmative action progress made by underrepresented groups, although this can be contentious.

Affirmative action outreach - It appears Seagate has made some affirmative action outreach efforts, which may have increased Protestant representation in its work force in recent reporting periods. The company reported that its officials in Derry have taken some affirmative action steps. Local company officials reported that affirmative action efforts "are not applicable at the Limavady facility," however. The significant increase in the overall proportion of Protestants at the company from 1996 to 2000 amidst rapid employment increases appears to confirm that the company has made efforts to reach out to Protestants.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal.

Signet Armorlite

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Crossbows Optical Ltd.

Location	Lurgan		
Business	optical supplies		
Employees	(Data as of 2007)		
	Protestant	34	73.90%
	Catholic	12	26.10%
	Other	0	
	<u>Total</u>	<u>46</u>	

2009 Survey Response: None

Available information: Signet Armorlite, a private U.S. optics firm, acquired Crossbows Optical in 2000 from an Italian company called Galileo Industries Ottiche. Employment at the firm in Northern Ireland has fallen substantially since the mid-1990s, when there were nearly 190 employees. The company has not responded to any inquiries from the Northern Ireland Service.

Compliance with NI fair employment law and Code of Practice: No information is available on the company's fair employment policies.

Underrepresentation analysis: No group appears to be underrepresented at the company when the work force is compared to the Belfast travel-to-work area.

Conformance with MacBride principles: The company has not indicated its position on the MacBride principles, and as a private firm has never received a shareholder resolution on the subject, the usual route to a compliance accord.

Affirmative action outreach - No affirmative action appears warranted at the company given its work force breakdown.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal.

SMG

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	August 2006	Affirmative Action	No	FET Settlements	0

• SMG Sheridan

Location	Belfast		
Business	Arena Management		
Employees	(Data as of 2009)		
	Protestant	12	0.55%
	Catholic	8	00.36%
	Other	2	
	Total	22	

2009 Survey Response: Full

Available information: SMG Sheridan manages the Odyssey Arena, a Landmark Millennium Project for Northern Ireland. The Arena houses a cinema, a concert venue, the W5 discovery centre, the pavilion which offers bars and nightclubs and a space car park.

SMG is a joint venture with Hyatt Hotels and Aramark, a hospitality and facility management company based in Pennsylvania. Aramark responded to the Northern Ireland Service from 2002 through 2005, but has not responded since, although it signed an agreement to become MacBride compliant in August 2006, unlike Hyatt Hotels. However, the SMG Manager for Northern Ireland gave full response to the 2009 survey.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to all fair employment standards established by Northern Ireland law, and that its first triennial policy review was completed in January 2004. The company says it follows "best practice procedures as recommended by the Equality Commission and Northern Ireland HR consultants." The company recruits employees through public advertisements in the Belfast Telegraph, government job markets and the Internet. It always includes an EEO statement in its employment ads. SMG always uses a panel when interviewing job candidates, and sometimes ensures that both communities are represented. It says that all those involved in candidate selection receive training on equal employment issues, and that the company monitors the religious composition of the applicant pool and new hires to determine success rates by community. The company notes that all employees receive harassment training using materials from the Equality Commission. Senior managers at the company's operations in Northern Ireland are responsible for implementing SMG's EEO policy. Employees at the company have no union representation.

Underrepresentation analysis: Compared both with the 33 percent Catholic Belfast travel-to-work area and Northern Ireland as a whole, both communities appear to be adequately represented at the company. In the 2007 monitoring period, the percent Catholics among company employees increased by nine percentage points. However, in the 2009 survey response, the company resulted in having decreased its workforce by more than one third (from 77 to 22 employees), including currently 12 Protestants and 8 Catholics. Although the Catholic presence has decreased in comparative terms (from 42.9% to 36.4%) more than the Protestant's (from 57.1% to 54.5%), both communities were equally hit by the workforce reduction (down to one third).

Conformance with MacBride principles: Since this facility is a joint venture between two private companies, it has never received a shareholder resolution on the MacBride principles, which is the usual route to an agreement. The company reported its policies reflect the fair employment standards embodied in the MacBride principles of fair employment and it agreed to comply with monitoring by the Northern Ireland Service.

Affirmative action outreach - No affirmative action measures appear warranted

Grievances - The company reported that no complaints have been filed against it at the Fair Employment Tribunal and the most recent records as of August 2009 from the FET concur.

Sonoco Products

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1991	Affirmative Action	NA	FET Settlements	0

• Sonoco Alcore

Location	Lurgan, Co. Armagh		
Business	converted paper tubes		
Employees	(Data as of 2007)		
	Protestant	15	42.90%
	Catholic	20	57.10%
	Other	0	
	<u>Total</u>	<u>35</u>	

2009 Survey Response: None

Available information: Sonoco consistently responded to the Northern Ireland Service survey until 2006. Company officials met with Northern Ireland Service staff in 1990.

Compliance with NI fair employment law and Code of Practice: The company's fair employment policies appear to be consistent with the Code of Practice.

Underrepresentation analysis: Both communities appear to be fairly represented at Sonoco Alcore when compared with the religious composition of the Craigavon travel-to-work area and other possible catchment areas.

Conformance with MacBride principles: Sonoco told shareholders in 1991 that it "will continue to make lawful efforts to implement the fair employment practices embodied in the MacBride principles." The company says that it is ensuring implementation of the principles by adhering to Northern Ireland's fair employment law and reporting on its practices when information is requested.

Affirmative action outreach - No affirmative action plans appear warranted.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

Starbucks Corp.

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Aug-2006	Affirmative Action	NA	FET Settlements	0

• Starbucks

Location	13 locations throughout Northern Ireland		
Business	coffee		
Employees	(Data as of Sep. 2007)		
	Protestant	17	85.00%
	Catholic	3	15.00%
	Other	84	
	<u>Total</u>	<u>104</u>	

2009 Survey Response: None

Available information: Starbucks Coffee Company has a significant presence in Northern Ireland, with a total of 13 stores. The company employs 169 workers, about half of which work on a full-time basis. Starbucks completed the Northern Ireland Service survey in 2006 and 2008, providing detailed information on its staff and copies of its employment policies, but did not respond in 2009.

Compliance with NI fair employment law and Code of Practice: Starbucks' policies appear to be largely in line with the Code of Practice. It advertises all available positions to its employees and publicly using the Belfast Telegraph, the Newsletter, other local newspapers, the Internet and show windows. Starbucks includes an EEO statement in its ads and all employees who select candidate receive EEO training. When interviewing candidates, the company always uses a panel but it does not ensure both communities are represented. It reported, "We do not ask panel members to disclose their religious or political background. However, we intend to review this practice." Management in Northern Ireland and the human resources team are responsible for overseeing the EEO issues.

The company provided the Northern Ireland Service with copies of its EEO and harassment/ bullying policies. The EEO appears to have been customized for the UK and Ireland because it mentions, in addition to the standard EEO classifications, that it will not discriminate against members of the traveling community. It does now, however, specifically deal with sectarian issues. The harassment/ bullying policy outlines specific offenses that are inappropriate and how they are dealt with. Offenders who are found guilty of violating the policy could merely receive a warning or ultimately be dismissed.

Underrepresentation analysis: The large number of employees classified as "other" makes a full analysis more difficult and may indicate problems with the company's compliance with good monitoring procedures.

Conformance with MacBride principles: Starbucks reported that it is working towards bringing its policies in line with the MacBride principles. "We believe our company policies, including our equal employment and non-discrimination policy, as well as our company guiding principle of treating all partners with respect and dignity, entirely reflect the fair employment standards embodied in the MacBride principles," the company reported, stipulating that it has "been in the market for less than two years and is therefore still working toward specific compliance with all of the principles." Starbucks reported that it aims to amend its policy to include a discussion of sectarian emblems and to appoint staff to deal directly with the principles by the next monitoring period. The company reports that employees are encouraged to raise concerns about fair employment issues. Starbucks has a business conduct hotline for those who wish to be anonymous. "When complaints are received," Starbucks reported, "we have procedures in place to ensure there is prompt investigation and effective response."

Affirmative action outreach - No affirmative measures appear to be warranted.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal. Starbucks has a grievance procedure that allows for employees to contact an independent employee relations representative through a hotline if they do not want to address the complainant with their immediate supervisor. Employees can also bring a colleague of their choosing to a grievance hearing, which may increase comfort for employees who want to be accompanied by a fellow-community

member. The procedure ensures that grievances are dealt with in a timely manner, but it only allows for one appeal to a management decision.

Tech International

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2007	Affirmative Action	NA	FET Settlements	0

• Aromet Group Ltd (traded as Tech Europe Ltd.)

Location	Lisburn		
Business	tire repair products		
Employees	(Data as of 2007)		
	Protestant	37	69.00%
	Catholic	17	31.00%
	Other	1	
	Total	55	

2009 Survey Response: None

Available information: A private firm from Johnstown, Ohio, Tech International is North America's largest maker of tire repair products. It announced in 1998 that it would invest £2.8 million in a joint venture with Aromet Group Ltd., a family-owned automobile tire and tube repair company in Lisburn. The joint venture was christened Eurotech Ltd. Tech International's website said that the modern, state-of-the-art facility in Lisburn is Eurotech's main facility; a second facility is in Budapest, Hungary. The Northern Ireland government provided support for the Lisburn venture of £743,500.

The company is listed as Tech Europe in the Equality Commission monitoring report. Employment rose to 101 employees in 2003 and dropped back to 81 workers in 2004, falling further to 55 employees by 2007.

Underrepresentation analysis: Lisburn, where Aromet Group's facilities are located, is 31 percent Catholic. Using Lisburn as the catchment area for most employees, both groups appear to be fairly represented. In past years, Catholics were slightly underrepresented. Some Catholics in West Belfast and areas not far from the town of Lisburn, where the company is located, say they are intimidated by the town.

Conformance with MacBride principles: In 2007, the company completed the Northern Ireland Service survey and indicated that it was compliant with the MacBride principles.

Affirmative action outreach - Tech Europe is not taking any affirmative action.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal.

Tekni-Plex

MacBride Agreement	No	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Colorite Europe Ltd.

Location	West Belfast
Business	PVC compounds
Employees	(Data as of 2006)
	Total 26

2009 Survey Response: None

Available information: The privately held company has not responded to the Northern Ireland Service fair employment survey since 2000. Company officials met with Northern Ireland Service staff in Belfast in 1997, around the time the plant opened.

Compliance with NI fair employment law and Code of Practice: The company's policies and programs as described in the past generally appeared to be consistent with the Code of Practice, particularly for a company of its small size. The facility worked closely with the Equality Commission to establish its policies from the beginning. The company used a consulting firm to select management and the government's training and employment agency for advertising, initial screening and interviewing of its production work force. The agency advertised in all three Belfast-based daily papers, a practice recommended by the MacBride proponents. The company also said it used the Belfast Telegraph to advertise administrative staff openings. Recruitment advertisements have included EEO statements. The company said it always used an interview panel for job candidates, but given its small number of management personnel cannot always ensure that both communities are represented on the panel. Not all employees involved in candidate selection received equal employment training, and not all job openings were publicly advertised. It included an EEO policy in its employment handbook.

Underrepresentation analysis: The most recent monitoring report from the Equality Commission shows only that the company employs zero to nine Protestants. The Northern Ireland Service does not assess the demographics of workplaces with fewer than 30 employees.

Conformance with MacBride principles: The company says that if the MacBride principles "demand nothing more than is demanded by the fair employment legislation, they are unnecessary. If they demand more than is required by the fair employment legislation, they are unlawful." No MacBride shareholder resolutions, the usual route to an agreement, were proposed to PureTec, Colorite's publicly held predecessor parent, through the 1998 proxy season, and now that the company is privately held, none are possible.

Affirmative action outreach - The company said in the past that it did "all in its power within the law to encourage fair participation of both communities in its work force." Beyond including an equal employment statement in its recruitment advertisements, the company did not appear to be taking specific affirmative action outreach measures for the Protestant community.

Grievances - No recent complaints have been filed against the company at the Fair Employment Tribunal.

TeleTech Holdings

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Dec-2005	Affirmative Action	Yes	FET Settlements	0

• TeleTech Holdings

Location	Belfast				
Business	customer relationship management services and call centers				
Employees	(Data as of 2007)				
	Protestant	225	35.20%		
	Catholic	414	64.80%		
	Other	289			
	<u>Total</u>	<u>137</u>			

2009 Survey Response: None

Available information: TeleTech has responded in full to the Northern Ireland Service fair employment survey for several years, but did not respond in 2007, 2008 or 2009. Company representatives also met with Service staff onsite in 2003. TeleTech Holdings opened its multi channel customer interaction center in 2001 to provide customer relationship management services. The work force has fluctuated since then, falling to 137 by 2006 and growing nearly sevenfold to 928 in 2007. In 2009, the company announced plans to create 80 new jobs at its call center in Belfast, hiring staff fluent in 15 different languages.

Compliance with NI fair employment law and Code of Practice: The company has described its fair employment policies in detail, saying also that it complies with all fair employment legislation. It has provided training for managers on fair employment issues and "enforces its own strict fair employment policy." The company has its own code of conduct, which applies worldwide to its operations. It does not have a Northern Ireland-specific fair employment policy, as recommended by the Code of Practice, but says that its UK-wide policy is appropriate.

TeleTech publicly advertises job openings unless it seeks to promote internal candidates, in which case it notifies all employees. To attract public candidates, it advertises on the Internet, in the Belfast Telegraph, in local papers, at government run job markets and at community organizations, universities, colleges and other schools. The company set specific criteria for each job opening and draws up advertisements to reflect these criteria. Candidates are assessed using standard tests, and progress to interviews when successful. Although in the past TeleTech has reported that its selection panels "are always multi-denominational and comprise both genders," in its most recent survey response it says panels are not always used and do not always have cross representation. The company provides feedback to all candidates. Employees involved in candidate selection have received EEO training, and the company analyzes the religious composition of its applicant and new hire pools by community affiliation, which can be a useful check on bias in hiring practices. Employees are treated equally in all aspects of employment, without regard to "gender, race, age, religious or political opinion, disability status or ex-offender status," TeleTech reports. The company consults with employees on its policies on a variety of workplace issues but to date no fair employment issues have arisen for consideration.

Underrepresentation analysis: Protestants appear to be underrepresented at TeleTech when they are compared to the Belfast travel-to-work area or all of Northern Ireland. The company has frequently referred to the necessity of its foreign workers given TeleTech's multi-lingual contracts. It says many of its employees are from mainland Europe and refers to the company's "Italian team." If TeleTech counts European workers from majority Catholic countries as Catholics for the purposes of Northern Ireland fair employment monitoring, it may skew the figures. TeleTech says the Equality Commission has refrained from devising an affirmative action plan because the work force is in line with the commission's recommendations.

Protestants also appear underrepresented among the 504 new hires with an identified religious background during the last monitoring period.

The company is located in the Duncairn Gardens area of North Belfast--a neighborhood notorious for its sectarian tension. It is located on an interface between loyalists and republicans and sees violence regularly; in 2002 an employee was injured in the disturbances. The level of violence has decreased significantly since then, however.

Conformance with MacBride principles: In its 2005 survey response, the company said its policies reflect the spirit of the MacBride principles and it agreed to respond to the Northern Ireland Service annual survey. The company received shareholder resolutions asking it to implement the MacBride principles in 2003, 2004 and 2005; the proposal received 4.9 percent support in 2005, making it ineligible for resubmission for the next three years. The proposal received 6.1 percent in 2004 and 3.5 percent in 2003.

Affirmative action outreach - TeleTech says it has made special efforts to attract underrepresented employees, using job markets in particular areas and making special efforts to attract the unemployed. The TeleTech investment was part of the government's plan to draw more companies to North Belfast, which has high rates of unemployment, although Equality Commission officials and others told the Northern Ireland Service in 2002 that the company was not particularly successful in attracting recruits from the local area. Nonetheless, TeleTech says that it is "actively working with organizations representing the unemployed for both major religious communities in Northern Ireland."

Grievances -A case was filed against the company at the Fair Employment Tribunal in 2006 and conciliated in 2007.

The company reports that it has a confidential help line, "my safe workplace," that employees can use along with consultation with human resources personnel to air grievances. TeleTech also notes it has formal grievance and harassment policies, although it did not provide copies to the Northern Ireland Service. Finally, the company has a "stringent code of conduct to which all our people are required to operate."

Terex

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Nov-2002	Affirmative Action	Yes	FET Settlements	0

• Powerscreen International Distributors Ltd.

Location	Dungannon, Co. Tyrone		
Business	engineering		
Employees	(Data as of 2007)		
	Protestant	56	17.10%
	Catholic	271	82.90%
	Other	40	
	Total	367	

2009 Survey Response: None

Available information: Terex responded in full to the Northern Ireland Service surveys between 2000 and 2002, but has not completed the survey since then. Terex bought Powerscreen PLC, the former parent of Powerscreen International Distribution Ltd., in 1999, after an accounting scandal at the former parent company. Terex has a MacBride agreement, which lapsed for a time, although its lack of cooperation with the Northern Ireland Service since 2006 has put its compliance in jeopardy.

In 2009, Powerscreen announced plans to cut 90 jobs, reducing its work force by one fifth.

Equality Commission officials reported that the company appears to employ most of its workers as contractors. The company reported that it manufactures through a system of onsite subcontractors who employ all shop floor manufacturing personnel, for which the company did not supply data. The company did not indicate how many contract workers there are at the site, nor what kind of fair employment oversight the company has over these workers. Managers, engineers, marketers and designers are direct employees of Finlay. A fair employment assessment of the company's operations is therefore made very problematic.

Compliance with NI fair employment law and Code of Practice: Powerscreen reported in 2002 that it complies with Northern Ireland fair employment law and the recommendations and legal requirements of the Code of Practice. The Equality Commission has provided materials for non-sectarian training for all employees, including subcontractors and their employees.

The company advertises as widely as possible, using local papers that cater to both the Catholic and Protestant communities. For management positions, the company has used the Belfast Telegraph and the Sunday Life. Additionally, the company's job advertisements have encouraged Protestants to apply. The company also has conducted outreach in schools.

The company advertised openings internally through notice boards and email. It also tracked the success rate of applicants from both communities. When interviewing job candidates, the company said it ensured that both communities were represented on the selection panel, but it acknowledged that this was sometimes difficult given the low number of Protestant employees overall.

The company ensured that everyone involved in candidate selection had received equal opportunity training. Training for the rest of the employees was underway in 2002.

Underrepresentation analysis: At 17 percent of the work force, Protestants appear to be underrepresented when compared to Northern Ireland as a whole or Dungannon, which has a working-eligible Protestant portion of about 32 percent. Protestants were also underrepresented among appointees in 2007.

Both of the company's locations pose a chill factor to Protestants.

Conformance with MacBride principles: The company reached an agreement to comply with the MacBride principles in November 2002. It allowed the commitment to lapse, but it provided a copy of its Fair Employment Monitoring Return to the Northern Ireland Service in 2006.

Affirmative action outreach - The company has adopted an affirmative action policy developed with the help of the Equality Commission to attract Protestants. The policy outlines an overall goal of increasing Protestant representation in the work force to 40 percent, and Protestant representation

among applicants and appointees to not less than 45 percent by 2003. The company views these figures as a good benchmark on which to judge the success of its affirmative action program, although it pointed out that reaching the goals would probably require substantial new recruitment that does not appear to be in the offing. The company also has an outreach program with local schools that it hopes will contribute to an increased number of Protestant applicants.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal.

Texas Pacific Group

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	1

• Burger King franchises

Location	19 locations province-wide
Business	Fast-food Restaurants
Employees	(Data as of 2008)
	Total 475

2009 Survey Response: None

Available information: The company has 19 locations listed on its website, in Antrim, Ballymena, Bangor (three sites), Belfast (six sites), Armagh, Newtownards, Coleraine (two sites), Lisburn, Derry, Newry and Newtownabbey. Since each store is a franchise operation, the Equality Commission does not collect overall information for the company. No information on the company's policies and procedures is available. Without additional information from the company, it is not possible to determine whether there is fair representation at the company. No complaints have been filed against the company at the Fair Employment Tribunal.

Conformance with MacBride principles: In past years, the company indicated that its policies reflect the fair employment standards embodied in the MacBride principles, but it has not consistently complied with monitoring by the Northern Ireland Service.

Texas Pacific Group

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	1

• Debenhams Retail

Location	two in Belfast, one in Derry		
Business	department stores		
Employees	(Data as of 2007)		
	Protestant	206	30.70%
	Catholic	465	69.30%
	Other	64	
	<u>Total</u>	<u>694</u>	

2009 Survey Response: None

Available information: Debenhams, a department store retailer that is more than 200 years old, has 100 stores in the UK and Ireland. The company has responded in full to the Northern Ireland Service surveys, but did not respond in 2006 or 2007 and gave a minimal response in 2008. Employment has fluctuated significantly, going from 431 in 2003 to below 300 in 2004, back to nearly 700 in 2006 and 2007.

Compliance with NI fair employment law and Code of Practice: In 2005, Debenhams provided a copy of its EEO policy and answered questions about its employment practices. The company says that all of its openings are publicly advertised, in local and regional newspapers, government job markets, on the Internet, and on its own company intranet. When selecting candidates for employment, it sometimes uses a panel with multiple interviewers, but does not always ensure both communities are represented on the panel. All staff involved in candidate selection have received training on equal employment issues, and Debenhams sometimes reviews the religious composition of applicant pools and new hires to determine success rates by community. Any redundancies follow company guidelines that do not disproportionately affect one group, the company says. The personnel manager in Northern Ireland is responsible for all EEO and affirmative action matters.

The company's written policy forbids discrimination on a number of grounds, including religion, and says that it will "strictly comply" with Northern Ireland fair employment law. Debenhams says that it will not permit unequal treatment of applicants, employees or customers.

Underrepresentation analysis: Protestants appear to be underrepresented in the overall work force according to the total figures. When the company last provided detailed information on the work force composition, the Northern Ireland Service compared managers and professional workers to a catchment area including all of Northern Ireland and the rest of its workers to the Belfast travel-to-work area. Protestants likewise appeared to be underrepresented among clerical workers, sales staff, and miscellaneous low level employees (sales staff make up 85 percent of all employees).

Conformance with MacBride principles: In past years, Debenhams indicated that its policies reflect the fair employment standards embodied in the MacBride principles, but it has not consistently complied with monitoring by the Northern Ireland Service.

Affirmative action outreach - Debenhams does not consider either community to be underrepresented in its work force. It does not have any affirmative action programs in place, nor does it take any special efforts to ensure the fair participation of either community in its recruitment campaigns or training programs. Given the current work force breakdown, it appears that some efforts to increase the proportion of Protestant applicants are warranted.

Grievances -No fair employment grievances have been filed against the company in recent years. The company's policy directs employees with grievances to their own manager or the personnel manager, and says any incidents will be treated with the "strictest confidence." It says it will "take disciplinary action, up to and including dismissal, against any employee who is found to have discriminated against any other person on any of the grounds set out in this policy."

Texas Pacific Group

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	1

- **Drumkeen Holdings Ltd. t/a Burger King**

Location	Belfast
Business	Property holding company
Employees	(Data as of 2007)
	Total 37

2009 Survey Response: None

Available information: Drumkeen Holdings Ltd. t/a. Burger King is a property holding company. It registered with the Equality Commission in 2001 and employs 37 workers, of whom fewer than 10 are Catholic. The office is located in a predominately Protestant area, but it is relatively mixed compared to other areas of Northern Ireland and should not be off-putting to either community. No fair employment grievances have been filed against the company.

Texas Pacific Group

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	1

- **Vita Cortex (NI) Ltd.**

Location	Belfast
Business	foam converters
Employees	(Data as of 2007)
	Total 25

2009 Survey Response: None

Available information: Texas Pacific Group bought Vita Cortex, a manufacturer and seller of foam and furniture, in May 2005. No information is available on the company's policies and procedures. The company is in a predominately Catholic neighborhood and may pose a chill factor to Protestants. The company is not listed in the Equality Commission's 2007 monitoring report, indicating that it has 25 or fewer employees. The company has no agreement on implementation of the MacBride principles. Three complaints have been filed at the Fair Employment Tribunal; of these, one was settled, and one was withdrawn and then later refiled by the same plaintiff. That case is still pending.

Grievances -Since 2003, one complaint has been filed against the company. The claim was settled in 2005.

TJX

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Apr-2009	Affirmative Action	NA	FET Settlements	0

• T.K. Maxx

Location	Belfast		
Business	retail clothing sales		
Employees	(Data as of 2008)		
	Protestant	74	50.00%
	Catholic	74	50.00%
	Other	14	
	Total	162	

2009 Survey Response: Full

Available information: TJX has responded consistently to the Northern Ireland Service survey since 2006, and in 2009 engaged substantially with the Northern Ireland Service. In addition to its 162 full-time employees, the company also has 459 part-time employees.

Compliance with NI fair employment law and Code of Practice: TJX announced its compliance with the MacBride Principles in the spring of 2009, following the withdrawal of a shareholder resolution sponsored by New York City pension funds. The company stated in its 2009 survey response that recruitment and selection in Northern Ireland are often advertised in local newspapers, via recruitment agencies, and internet, and all employees are aware. They are based on merit without regard to any of the above factors, including religious belief, community background, or political opinion. More specifically on Northern Ireland, within the company's hiring procedure candidates are always interviewed by a panel with multiple interviewers, from both communities, whose panelists have undergone equal opportunity employment training, and after examining the religious composition of applicants and new hires in order to determine success rate. Training is eventually provided for all employees and company legal advisors. Broadly, TJX told RiskMetrics to be insisting "on equality of opportunity in Northern Ireland as well as in the other countries in which we operate. We strongly support ongoing efforts to eliminate discrimination in Northern Ireland. Accordingly, we endorse the broad fair employment standards embodied in the MacBride Principles where implemented consistent with the law of Northern Ireland."

Underrepresentation analysis: The religious composition of the company's work force has changed substantially in the last couple of years, moving from a majority Catholic work force to a more evenly balanced composition. As of TJX's 2009 survey, employment is equally distributed among the two communities. In the past, it appeared that Protestants were underrepresented; this is no longer the case when the company's two job categories, managers and sales associates, are compared to a catchment area including all of Northern Ireland. This is the most appropriate comparison because companies typically recruit from the entire region for these positions. Protestants were overrepresented among applicants for Sales/Customer Service positions, with the company reporting 1,115 Protestant applications and only 169 from Roman Catholics.

Conformance with MacBride principles: The company has not reached an agreement with shareholder proponents on the MacBride principles, although it told the SEC that it "essentially complies with the practices outlined in the MacBride principles." In its 2005 survey response, the company says that instead of adopting the MacBride principles, it follows the "code of conduct and guidelines laid down by the Equality Commission of Northern Ireland. We have a robust recruitment and selection process, which determines the best person for the job and we have credibility in the local marketplace as being an Equal Opportunity Employer." TJX has said in its proxy statement that adopting the principles could produce "divisiveness in the workplace." Votes on shareholder resolutions asking the company to implement the MacBride principles have dropped from previous levels near 20 percent. In 2004, investors gave only 9.3 percent support to a shareholder resolution asking for MacBride implementation, making the proposal ineligible for resubmission.

The company says the principles are aimed at anti-Catholic discrimination and that implementing them actually could lead to a decrease in the number of Catholic employees at T.K. Maxx, negating this aim. This is a view that was shared for some time by Interface, another U.S. firm that had an overrepresentation of Catholics and regularly received shareholder resolutions on the issue until it reached an agreement with activists in 2001. The principles themselves do not single out Catholics or Protestants for special consideration, but refer to a need for affirmative action for "underrepresented religious groups." Fair employment law in Northern Ireland requires affirmative action if either Catholics or Protestants are underrepresented compared to reasonable catchment areas. The wording of the principles suggests the same obligation, although it is clear the principles were initiated because of concerns over anti-Catholic discrimination.

Affirmative action outreach - No affirmative action measures appear to be warranted based on the current work force breakdown. The T.K. Maxx policy described to the Northern Ireland Service in the past said the company would adopt, "where necessary appropriate affirmative action measures to ensure the provision of equality of opportunity and fair participation for all sections of the community." As far as equality enforcement is concerned, the company told RiskMetrics it follows the guidelines of the equality Northern Ireland, senior management is responsible for oversight of the company's equality policy in Northern Ireland, and grievance procedure for complaints of religious or political discrimination provides for filing a complaint to someone other than a direct supervisor.

Grievances -No discrimination complaints have been lodged against the company at the FET.

United Technologies

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Jan-2001	Affirmative Action	Yes	FET Settlements	0

• Chubb (NI) Ltd.

Location	Belfast		
Business	security and fire		
Employees	(Data as of Aug. 2008)		
	Protestant	90	79.60%
	Catholic	23	20.40%
	Other	6	
	Total	119	

2009 Survey Response: None

Available information: United Technologies acquired Chubb, a spin-off of the former Williams PLC, in 2003. It provides electronic security systems, fire protection systems, security guards and security system monitoring. Its operations are headquartered in Dublin and company representatives told the Northern Ireland Service in a meeting held in 2005 that all policies and activities are run on an all island basis. Chubb's only Northern Ireland site is located in Belfast. Company representatives have said they expect sustained peace in Northern Ireland will spark increased investment and demand for their products.

Compliance with NI fair employment law and Code of Practice: In 2006, Chubb provided copies of its EEO, grievance, affirmative action and harassment policies to the Northern Ireland Service, all of which are in line with fair employment laws in Northern Ireland. The company reported that it used the Northern Ireland Service's 2004 profile to help revise its Equal Opportunities Policy to "encompass all aspects [for the] elimination of discrimination including specific mention to political and religious beliefs." It changed its hiring and selection processes to ensure all interviewers have received EEO training. It also makes "every effort" to have representation from both communities on interview panel, but admits "this cannot always be achieved due to the small number of employees available to sit on such panels."

Chubb publicly advertises all job openings and posts them internally to alert staff. It includes an EEO statement in job advertisements and posts them in the Belfast Telegraph, the Irish News, the Internet, the company intranet and in other local newspapers. It also reviews the religious composition of applicant pools and new hires to determine success rates by community.

In a meeting with the Northern Ireland Service in 2005, Chubb representatives said European Union regulations make it difficult to maintain balance in the community representation of the work force, specifically among the security staff. To ensure security guards do not lose their jobs in the event that a new company wins a contract to provide security service, essentially EU regulations require companies to hire employees along with a winning contract. This allows guards to maintain their jobs even if their company sells a contract to provide security. Company representatives said, "Dismissals are only permitted if they are for technical, organizational or economic reasons. The overall effect of this EU regulation is that companies who provide a service such as cleaning, security, catering tend to have a movement of employee population on contract wins/losses."

Company officials said these regulations are likely to change along with "new standards and practices in licensing and regulation of the security industry." Chubb has hired a recruitment officer for the Belfast office to replace local management in overseeing recruitment. The officer reports directly to the human resources department in Dublin.

All Chubb employees participate in the job task specific training. The company also has an employee scholar program, which "pays all expenses for higher education, provides paid time off for study and provides awards of company stock upon degree attainment." The human resources team is responsible for ensuring equal opportunities and senior management make sure those opportunities are implemented at the operational level.

Underrepresentation analysis: In past years, Catholics were significantly underrepresented in the work force overall and in several employment categories. Catholic representation dropped substantially between 2001 and 2004, most steeply between 2001 and 2002, when the percentage of Catholics fell from 37 percent to 19 percent, a reflection of a 20 percent drop in the total work force. Catholic representation continued to slip in 2004, reaching less than 17 percent as the work force shrunk by 9 employees. In a meeting with the Northern Ireland Service in 2005, Chubb representatives acknowledged this underrepresentation and described the affirmative action plan designed to boost the Catholic portion of its staff. In the most recent monitoring period, Catholics still appear to be underrepresented, but to a much lesser degree than in previous periods. Chubb commented in its most recent survey response, "Our affirmative action programs have shown an increase in the Catholic representation numbers since the last survey report. We continue to closely monitor our staffing levels to ensure we gain the maximum equitability in relation to representation of communities."

The company provides security and fire protection systems to its customers. The security industry in Northern Ireland has been heavily Protestant over the years, and the substantial reduction in security-related jobs and in the police force in the last several years--given the enduring paramilitary ceasefires and the continued peace talks--has put many qualified Protestant workers in the profession out of work. These developments do not vitiate the company's affirmative action obligations, however.

Conformance with MacBride principles: In a meeting with the Northern Ireland Service in 2005, Chubb said it would incorporate the MacBride principles into its policies by this year and in its 2006 survey response Chubb reported that its policies reflect the principles and agreed to complete the annual survey. The company did not respond to the Northern Ireland Service's 2007 survey, but resumed replying in 2008.

In 2005, company representatives told the Northern Ireland Service that that emblems have been banned from the workplace. UTC's other companies have successfully implemented the MacBride principles. Chubb representatives told the Northern Ireland Service that implementing the MacBride principles and fair employment regulations became a priority in 2005. Chubb has submitted copies of its policies to the Northern Ireland Service. The EEO policy says Chubb will "remain committed to the achievement of equal opportunities within all our activities and responsibilities." It specifically mentions religious and political persuasion as well as sexual orientation, age, race and language in its EEO policy.

Affirmative action outreach - In the past, Chubb told the Northern Ireland Service that while it recognizes the need to pursue affirmative actions and plans to seek guidance from its other member companies and the Equality Commission and change its policies in 2005, management had been occupied with integrating the company into UTC's other operations. It said it will "endeavor to expand its recruiting efforts more aggressively for underrepresented groups." In 2005, company representatives told the Northern Ireland Service that its goal was to increase the Catholic percentage of the work force by a few percentage points by June 2006. It has succeeded in these efforts and the community representation of its staff is much more balanced than in recent history. Chubb's affirmative action policy sets out a process by which community representation of the staff will be monitored annually to determine whether there is an imbalance and if affirmation action measures are necessary. According to the document, "the plan shall be reviewed and measured twice yearly and additional actions shall be developed to address any factors limiting success."

Chubb began advertising in the Irish News in 2005 to "attract a greater number of applicants from this readership," which are a majority Catholic. It also includes that statement, "We are an Equal Opportunities Employer" in any form of job advertisement as well as using job markets in predominately Catholic areas. As part of its affirmative action efforts, company representatives told the Northern Ireland Service that they were considering offering an additional financial incentive to its sales employees who obtain contracts in predominately Catholic areas with the intention that geographical targeting could lead to a boost in the Catholic portion of the work force.

Grievances -No fair employment grievances have been filed against the company in recent years.

Chubb and the trade union representing its workers have developed to a grievance policy, which includes provisions for a formal hearing and/or the use of an arbitration body. The UTC dialog and ombudsman programs also provide a confidential and secure environment for employees to raise complaints.

United Technologies

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Jan-2001	Affirmative Action	Yes	FET Settlements	0

• Otis Elevator

Location	Belfast		
Business	elevator sales, service, repair and installation		
Employees	(Data as of Feb. 2008)		
	Protestant	25	61.00%
	Catholic	16	39.00%
	Other	4	
	Total	45	

2009 Survey Response: None

Available information: Otis Elevator has consistently responded to the Northern Ireland Service survey.

Compliance with NI fair employment law and Code of Practice: Personnel procedures at Otis appear to be in line with the Code in hiring procedures and workplace standards regarding fair employment. Promotion and training programs are based on analyses of performance, the company said, as well as on business and individual needs. Job advertisements are placed in the Belfast Telegraph and Irish News and include an EEO statement. The company always notifies all employees about positions open to internal applicants. Structured interviews use two-person panels and allow only pre-determined questions related to job criteria. The company says both communities always are represented on interview panels. All employees involved in candidate selection receive equal employment training, and the company provides all management and supervisors with in-house equal opportunities training, using materials from the Equality Commission. Layoff procedures are not conducted on a last-in, first-out basis, but use performance, service, attendance and disciplinary records. The branch manager, overseen by the service operations director and audited by the personnel department, is responsible for fair employment matters.

Underrepresentation analysis: Neither group appears to be underrepresented at Otis Elevator. In previous years, when Catholics appeared to be slightly underrepresented, the company had said that it had difficulties finding skilled Catholic lift engineers with prior experience, but that it was addressing this issue through an engineering apprentice program. Applicant figures reported by the company during the most recent monitoring period still reflect this problem.

The company hired five people in the most recent monitoring period.

Conformance with MacBride principles: The company reached an accord on MacBride implementation with activists in 2001, following negotiations on a shareholder resolution that was withdrawn. The company had opposed shareholder resolutions on the subject in 2000, 1999 and 1994. Until passage of new fair employment legislation for Northern Ireland in December 1998, Otis had said the MacBride principles would be illegal under UK law. The company said the principles would require the use of quotas in staff recruitment, an assumption that MacBride advocates continue to refute.

Affirmative action outreach - The company should pay close attention to the representation of Catholics within the skilled labor employment category and implement affirmative action measures if the underrepresentation continues.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal. Otis says its harassment policy specifically outlines steps a complainant may take to file a grievance. Provision will be made for complaints to be taken to "independent human resources staff." The company's survey response indicated that its grievance procedure also allows employees to file a complaint confidentially. It also informs staff that they may raise issues with someone other than a direct supervisor or someone of the same community background.

Virgin Media

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Aug-2008	Affirmative Action	?	FET Settlements	0

• Virgin Media

Location	Belfast		
Business	Media		
Employees	(Data as of July 2008)		
	Protestant	62	63.30%
	Catholic	36	26.70%
	Other	7	
	Total	105	

2009 Survey Response: None

Available information: In January 2007, NTL and Virgin Mobile combined to form Virgin Media. NTL merged with television and phone provider Telewest in March 2006 and subsequently acquired Virgin Mobile in July. Job cuts were announced after both transitions and the Northern Ireland staff is less than half of what it was in 2005. The company now employs 105 workers. The mergers brought together different services and the newly rebranded Virgin Media can now offer cable TV, broadband Internet access, fixed telephone and mobile phone service.

NTL emerged from bankruptcy after a reorganization of its operations in 2002. The company was split into two firms--NTL UK and Ireland and NTL Euroco. Bondholders ended up with all the equity in the company's UK and Ireland unit and 86 percent of NTL Euroco. The reorganization caused NTL to shed 2,000 jobs in 2004, according to press reports, but this did not seem to affect its Belfast operations where employment dropped by only three jobs. Overall employment at the company in Belfast fell to 247 in October 2004, down from a high of nearly 500 in 2000; it had grown rapidly between 1996 and 2000.

Compliance with NI fair employment law and Code of Practice: Virgin Media reports that it complies with Northern Ireland fair employment law. The company uses an EEO statement in all public ads. The company tries to ensure that both communities are represented on interview panels. Virgin Media submits annual reviews to the Equality Commission in addition to its triennial policy reviews, as required by the fair employment law.

Underrepresentation analysis: Overall, both groups appear to be fairly represented compared to the population of Belfast, where the company is based. Catholics are slightly underrepresented among associate and professional employees and underrepresented among senior managers and sales people; however, the actual number of employees in these categories is small enough to make this underrepresentation statistically insignificant.

Conformance with MacBride principles: Virgin Media agreed with the State of Connecticut in 2008 to comply with the MacBride Principles.

Affirmative action outreach - No affirmative action measures appear warranted and none are in place.

Grievances -No recent complaints have been filed against the company at the Fair Employment Tribunal. Regarding an earlier complaint, NTL told the Northern Ireland Service, "The individual was dismissed after the company had followed through all stages of its disciplinary procedure, as a result of the associate's poor sales performance. The claim [was] one of unfair dismissal and religious discrimination." The company's standard grievance procedure allows employees to communicate complaints to someone other than a direct supervisor, and as needed to a person of the same religious background.

Wal-Mart Stores Inc.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2006	Affirmative Action	NA	FET Settlements	0

• Asda Stores Ltd.

Location	14 locations across Northern Ireland		
Business	supermarkets		
Employees	(Data as of Nov. 2009)		
	Protestant	1332	52.20%
	Catholic	1221	47.80%
	Other	40	
	Total	2593	

2009 Survey Response: Full

Available information: Wal-Mart acquired Asda in 1999, which bought 13 Safeway stores in mid-2005 from William Morrison. These stores operate as Asda. The company has 14 locations throughout Northern Ireland and employs of the largest work forces in the region. Wal-Mart has responded in full to Northern Ireland Service surveys for each of the past three years.

Compliance with NI fair employment law and Code of Practice: Asda provided comprehensive information on its policies and procedures regarding harassment, hiring and selection and EEO issues. The policies adhere to the standards established in the Code of Practice. Asda has won several awards for its positive work environment, including "best place to work awards" from Fortune magazine, and The Sunday Times newspaper, and it says it "works tirelessly to continue to earn and maintain that reputation." Asda's statement on equal opportunities attached to its survey response maintains that the company "actively promotes fair treatment and opportunity from all the recruitment and selection to training and promotion." It consults with a union that represents its workers (the USDAW) on a monthly basis, and it uses a software package recommended by the Equality Commission to monitor its work force. All employees are regularly briefed about the EEO policies that are in place.

Asda notifies all employees of job opportunities. When the company publicly advertises available positions, it uses a range of methods that ensures wide distribution, including the Belfast Telegraph, the Irish News, the Newsletter, other regional newspapers, job markets and the company intranet. Asda typically promotes from within for managerial positions. To select candidates, the company uses an interview panel comprised of employees who have received EEO training. It attempts to ensure both communities are represented on panels but reports this is not always possible.

Asda has not made any workers redundant in either of the two last monitoring periods, but its policy for this considers tenure. "Whilst length of service....will be one of the criteria for redundancy selection, management have the right to also consider relevant skills, experience and other matters in making the final selection. The mutual objective is to preserve a properly balanced and efficient work force."

Northern Ireland senior management, U.K. management, and Corporate headquarters oversee the company's equality policy in Northern Ireland, and harassment based on religion or political opinion can be reported filing a complaint confidentially and to someone other than the direct supervisor.

Underrepresentation analysis: Both communities appear to be fairly represented in the work force at Asda. The company has 14 locations throughout Northern Ireland, making the region as a whole the best comparison for composition of the staff. Currently, Asda has only 40 workers whose religion is not identified, indicating that the company's monitoring process is comprehensive and accurate. Catholics account for 47.8 percent of the staff with identified religion, which is in line with the 42.7 percent Catholic share of the available work force. Asda agrees that its work force should be compared to all of Northern Ireland as it says in the earlier survey response to undertake "a multi-site retail operation throughout Northern Ireland and requires its managers to be flexible in terms of work location."

In 2008 Asda stores hired nearly 900 new workers, of whom 57 percent were Catholic. In 2009, while registering no redundancies, the company hired 935 new employees, the community representation

was distributed as follows: 46.8 percent Protestants, 51.9 percent Catholics, and 1.3 percent non affiliated. The greatest Standard Occupation Classification for hiring was Customer service, with 742 new hires, only 12 (1.3 percent) of which did not declare membership in either community.

Conformance with MacBride principles: Wal-Mart has reported that its policies adhere to the standards embodied in the MacBride principles and it has agreed to comply with monitoring by the Northern Ireland Service. Asda notes that, "it does not provide security for the protection of its employees while traveling to and from work as this is not currently required in practice. Should the need arise in the future then Asda would be prepared to allocate resources to provide this protection." The MacBride principles do not require employers to provide protection while traveling to and from work, but the principles call on companies to make reasonable efforts in the regard where possible. For example, some employers located in contentious areas provide security cameras in employee parking lots.

Affirmative action outreach - No affirmative action measures are warranted at this time.

Grievances -In 2009, one former Asda employee filed two claims against the company. Those claims are still pending. The company's grievance policy sets out a clear procedure for handling employee complaints that allow workers to voice complaints without fear of victimization. Asda specifies that "any particular stage can be omitted with the consent of the employee," such as in a case where a worker prefers not to bring a complaint to their immediate supervisor. Workers may raise also issues with their human resources representative and/or to their union representative.

Warner Chilcott PLC

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2008	Affirmative Action	NA	FET Settlements	0

• Warner Chilcott (UK)

Location	Larne		
Business	Pharmaceuticals		
Employees	(Data as of 2007)		
	Protestant	65	68.40%
	Catholic	30	31.60%
	Other	14	
	<u>Total</u>	<u>109</u>	

2009 Survey Response: None

Available information: Warner Chilcott (UK) manufactures pharmaceuticals and registered with the Equality Commission in 1990. Its parent company, also named Warner Chilcott, is headquartered in the United States and incorporated in Bermuda.

Underrepresentation analysis: Neither group appears to be underrepresented at Warner Chilcott.

Conformance with MacBride principles: Warner Chilcott agreed in 2008 to comply with the MacBride Principles in response to a shareholder resolution filed by the New York City pension funds for the 2009 proxy season.

Affirmative action outreach - No affirmative action measures appear to be warranted.

Watson Pharmaceuticals

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Jan-2002	Affirmative Action	NA	FET Settlements	0

• Nicobrand Ltd.

Location	Coleraine		
Business	bulk chemical processing		
Employees	(Data as of Sept. 2008)		
	Protestant	19	76.00%
	Catholic	6	24.00%
	Other	1	
	Total	26	

2009 Survey Response: None

Available information: Nicobrand operates in a 10,000 square foot bulk chemical processing facility in Coleraine. Staff levels are remained stable for the last few years at around 25 employees.

Compliance with NI fair employment law and Code of Practice: The company says that it complies with Northern Ireland fair employment law and the recommendations and legal requirements of the Code of Practice. The company publicly advertises all job openings, using local and regional newspapers, and always notifies employees about positions open to internal applicants. When selecting candidates, Nicobrand uses an interview panel comprised of members of both communities who have received EEO training. Applicants are reviewed to determine success rates by religion--a useful check to ensure a bias has not crept into the system. The company uses materials from the Equality Commission to conduct workshops for managers and supervisors on sectarian harassment and intimidation in the workplace. Senior managers in Northern Ireland oversee equal employment programs.

Underrepresentation analysis: The Northern Ireland Service does not draw any conclusions from statistical assessments on work forces that have fewer than 30 employees.

Still, there does not appear to be any underrepresentation at the company overall or in any particular job category. The number of employees who identify themselves as Catholics has fallen by a few employees each year, but the community still appears to be well represented.

Conformance with MacBride principles: The company reached a MacBride implementation agreement in 2002, which prompted the New York City pension funds to withdraw a shareholder resolution on the subject. In the 2006 survey response, Nicobrand reported that the company "Ensure[s] all managers are aware and comply with Northern Ireland fair employment practices."

Affirmative action outreach - No affirmative action efforts currently appear warranted, although the company includes an EEO statement in its ads and uses job markets in particular areas to achieve appropriate representation of both communities.

Grievances -No complaints have been filed against the company at the Fair Employment Tribunal. The company provided the Northern Ireland Service with a brief description of its grievance policy in 2005. The policy allows for employees to raise confidential complaints and to raise issues with someone other than their immediate supervisor, which may include someone of the same community background. The company reports that concerns are always "investigated fully." The policy lays out specific timelines and procedures to follow when grievances arise. The procedure allows for an appeals process.

Xerox

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Jun-1996	Affirmative Action	NA	FET Settlements	0

• Xerox

Location	Belfast		
Business	office equipment sales and service		
Employees	(Data as of 2007)		
	Protestant	27	62.80%
	Catholic	16	37.20%
	Other		
	<u>Total</u>	<u>43</u>	

2009 Survey Response: None

Available information: Xerox has provided regular responses to the Northern Ireland Service fair employment survey, but has not done so since 2005. It has a major manufacturing plant just south of the Northern Ireland border, in Dundalk, and a help center in Dublin, both of which were started up after the Good Friday peace agreement in 1998. Company officials said these investments showed "our renewed commitment to Northern Ireland as the peace process moves forward."

Compliance with NI fair employment law and Code of Practice: The company's practices appear to be generally in line with the Code of Practice. Xerox has held fair employment awareness raising programs for employees, and EEO workshops for those who recruit and promote workers. All employees involved in candidate selection have received EEO training. The company uses interview panels, but says its small size means "it is not always possible" to have both communities represented on the panels. It adds that "the HR Executive is based in the UK and not aligned with any religious affiliation." All vacancies are publicly advertised and the company says it always reviews the religious composition of applicant pools and new hires to determine success rates by community. Xerox has worked to promote the New Deal, a government initiative to encourage employment for the long-term unemployed.

Underrepresentation analysis: At 37.2 percent, Catholics are slightly overrepresented at Xerox in comparison to the 33 percent Catholic Belfast travel-to-work area, but this overrepresentation is not statistically significant. Further information about the company's work force is needed before a determination of underrepresentation can be made.

Data provided by the company in 2005 showed that Protestants were underrepresented in sales positions.

Conformance with MacBride principles: Xerox reached an agreement on MacBride implementation with the New York City Comptroller in 1996. At that time, the company also agreed to provide, for the first time, information on the religious composition of its applicants. The company has not responded to the Northern Ireland Service survey since 2005, however, leaving its MacBride-compliant status in jeopardy.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -A complaint filed against the company at the Fair Employment Tribunal in July 2003 was dismissed in April 2004. No other grievances have been reported.

Yum Brands

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Herbel Restaurants

Location	province-wide		
Business	KFC fast-food restaurants		
Employees	(Data as of 2007)		
	Protestant	153	50.30%
	Catholic	151	49.70%
	Other	179	
	Total	483	

2009 Survey Response: None

Available information: Yum Brands has declined to respond to the Northern Ireland Service fair employment survey and has said only that its franchisee follows Northern Ireland fair employment law. Most recently, the company said in its 2007 proxy statement that its franchise businesses in the region are already required by law to adhere to the Fair Employment & Treatment (NI) Order 1998, and "we do not believe it is necessary or appropriate for the Company to attempt to force its franchisees to adopt similar but not identical fair employment guidelines that overlap with the existing laws of Northern Ireland."

Information on the overall work force composition of Herbel Restaurants is available from the Equality Commission. The Northern Ireland Service interviewed a broad range of sources in Northern Ireland in 2002 about Kentucky Fried Chicken outlets in the province and related fair employment issues. Some information on sectarian problems at the chain also is available from press reports. Equality Commission staff in Belfast have said that Herbel Restaurants has taken some action recently to reform its fair employment practices.

KFC opened its first UK outlet in 1965 and since 2000 has been expanding rapidly, with more than 500 outlets in England, Scotland and Northern Ireland. A private Belfast firm, Herbel Restaurants, holds the Northern Ireland KFC franchise.

Significant unanswered questions exist about fair employment matters at Yum Brands' operations in Northern Ireland, years after a sectarian loyalist mural was removed from one of the KFC outlets in north Belfast. Death threats against Catholics working at two other KFC outlets also were reported in 2002. Several Belfast sources indicated that the mural, on the lower Shankill Road just outside central Belfast, was painted because of internecine feuding between different loyalist groups about territory and control of illicit business in the area, a turf battle that was later resolved at least for a time. The location is one where Catholic would never work or visit, next to a treeless brick housing estate--one of Belfast's most intimidating neighborhoods. A Yum Brands official said that "political statements" such as the mural are unacceptable to it and requested the franchisee to remove the painting; the mural disappeared two days later in the middle of the night.

Compliance with NI fair employment law and Code of Practice: Yum Brands provided no information about the fair employment policies of Herbel Restaurants. A separate inquiry directed to Herbel Restaurants also elicited no response. The loyalist paramilitary mural on the Shankill Road KFC outlet in Belfast was a clear violation of the neutral workplace provisions of Northern Ireland's fair employment law. But nobody filed a formal complaint about it and the Equality Commission itself found the issue too sensitive to broach.

Underrepresentation analysis: Herbel Restaurants reporting that over one-third of its employees do not come from an identifiable religious community--particularly striking in light of the fact that in the previous monitoring period, over 90 percent of employees were classifiable based on community--may be a sign of significant flaws in the company's fair employment monitoring. Based on available information, Protestants appear to be underrepresented among employees with identified community affiliation--a state that was also true in 2006, when the vast majority of employees' communities were identified.

For many years, Catholics appeared to be slightly underrepresented when the work force of Herbel Restaurants was compared to the economically active population of Northern Ireland, which as of 2001 was 42.4 percent Catholic. No information is available on the work force composition at individual KFC outlets. The location of these outlets and the composition of their local recruitment areas could change the overall analysis significantly, but further information to conduct such an analysis would have to come from the company. Concurrent with the rise in Catholic representation was a halving of the company's reported work force, from 992 in 2004 to 492 in 2006 and 483 today.

The paramilitary mural on the side of the Shankill Road KFC was a clear violation of the MacBride principles. A very substantial chill factor exists for Catholics at some KFC locations in Northern Ireland. Catholics working at two KFCs, in East Belfast and in Antrim, northwest of Belfast, are reported to have received death threats from loyalist paramilitary groups in the early years of this decade. Also, news reports indicate a victim was knocked to the ground outside the KFC in Belfast's Bradbury Place on March 29, 2004. Nonetheless, given the overall employee composition of Herbel Restaurants, it is clear that not all KFC outlets present a chill factor to Catholics.

In contrast to many industrial locations, the workers at fast food restaurants are quite vulnerable, given the late hours the franchises are open, their relative youth, and the relatively few staff on duty. Ensuring that they are protected while at work is a significant challenge, yet one that is clearly the company's obligation under Northern Ireland law.

Conformance with MacBride principles: A shareholder resolution asking for MacBride implementation at Yum Brands has been voted on annually by the company's shareholders since 2003, usually receiving double-digit support but receiving only from 9.2 percent support in 2008, leaving it ineligible for resubmission until 2011. Yum Brands has regularly opposed the proposal, saying that the MacBride principles are superseded by Northern Ireland's fair employment law, and that it cannot force Herbel Restaurants to comply with the principles because they have no legal force in Northern Ireland.

Affirmative action outreach - No information is available on any affirmative action efforts the company may be making.

Grievances -A complaint filed against the company in 2005 is pending.

Yum Brands

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Restaurant Management Services Ltd.

Location	Nine locations province-wide		
Business	pizza		
Employees	(Data as of 2007)		
	Protestant	152	53.10%
	Catholic	134	46.90%
	Other	99	
	<u>Total</u>	<u>385</u>	

2009 Survey Response: None

Available information: Restaurant Management Services Ltd., which owns and runs all the Pizza Hut franchises in Northern Ireland, announced in 2009 that it would close five of its 14 locations. The Northern Ireland Service is not aware of any fair employment problems that have surfaced at these restaurants, which are operated separately from the KFCs. (See the Yum Brands-KFC profile for details on a controversy involving a sectarian mural painted on the side of a KFC restaurant.) No information is available about fair employment policies at Restaurant Management's Pizza Hut locations.

Conformance with MacBride principles: Yum Brands has regularly received shareholder resolutions regarding the MacBride principles, though the resolutions have all focused on KFC franchises, rather than Pizza Huts.

Grievances -No fair employment grievances have been filed against the company.

SECTION II
U.S. COMPANIES WITH 10 OR FEWER EMPLOYEES
IN NORTHERN IRELAND

Abbott Laboratories

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Jun-2001	Affirmative Action	NA	FET Settlements	1

• Abbott Laboratories Ltd.

Location	employees work from home
Business	pharmaceutical, health care and diagnostic products
Employees	(Data as of 2008)
	Total 9

2009 Survey Response: None

Available information: Abbott Laboratories regularly responds to the Northern Ireland Service survey. Employment has been falling, from 16 in 2002 to nine in 2006, a number that has held steady in recent years.

Abbott employees in Northern Ireland work from home and report to a head office in England.

Compliance with NI fair employment law and Code of Practice: The company has a worldwide code of conduct that "is rigorously enforced," according to a company representative. The code includes sections on equal employment and workplace harassment, and specifically indicates that the company will not discriminate based on a range of characteristics, including religion and nationality. The company's description of its Northern Ireland EEO policy indicates that the policy complies with local requirements; the policy is overseen by an Abbott human resources manager based in England. The company says that "there is no question of any discrimination on grounds of religion."

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

Conformance with MacBride principles: The company says its employees "have a great deal of independence" as they work from their homes, and has concluded that "the MacBride principles would be difficult to apply." But the company says its policies reflect the fair employment standards embodied in the MacBride principles, and said it is willing to respond in full to the Northern Ireland Service annual survey. It therefore meets the conditions of MacBride implementation agreements.

Affirmative action outreach - No affirmative action measures are warranted. Still, the company reports that all managers are trained on employment law and specifically on discrimination and harassment.

Grievances -The company settled a complaint of wrongful selection for redundancy in 2006. A company representative said the decision to settle "was a sensible financial solution for all concerned and Abbott still maintains that the case was unfounded."

American International Group

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Sep-2004	Affirmative Action	NA	FET Settlements	0

- **AIG Europe (UK) Ltd.**

Location	Belfast
Business	insurance services
Employees	(Data as of 2008)
	Total 2

2009 Survey Response: None

Available information: AIG Europe (UK) provides general insurance and has two employees. The company has regularly responded to the Northern Ireland Service survey and provided copies of its EEO policy. Parent company American International Group had operated two businesses in Northern Ireland, AIG Europe (UK) and AIG Management (UK), which had one employee and provided life insurance. As of 2008, AIG Management (UK) no longer has any employees in Northern Ireland.

AIG initially opened offices in Belfast in March 2004, estimating that it would ultimately employ about 150 people. A company representative explained, "the business area struggled to recruit the volume of staff it needed to sustain the business."

Ametek

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Jan-2002	Affirmative Action	NA	FET Settlements	0

• Ametek Power Instruments

Location	Lisburn
Business	monitoring equipment
Employees	(Data as of 2009)
	Total 9

2009 Survey Response: None

Available information: Ametek's small engineering firm in Lisburn makes monitoring equipment and is part of the company's Rochester Instrument Systems division. The company completed the Northern Ireland Service surveys in 2002, 2004 and 2005 but has not responded since, putting its MacBride compliance in jeopardy. Ametek provided copies of its EEO policy and recruitment procedures. The company's Lisburn office is still listed on its website, but it was not included in the most recent Employers Register, meaning that it has fewer than 10 employees

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

Conformance with MacBride principles: The company reached a formal agreement on implementation of the MacBride principles, prompted by a 2002 shareholder resolution asking for their implementation, but compliance has lapsed due to the company's inability to comply with outside monitoring.

Affirmative action outreach - No affirmative action measures are warranted.

Grievances -No fair employment grievances have been filed against the company.

Avon Products

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- **Avon Cosmetics Ltd.**

Location	employees appear to work from home
Business	cosmetics, fragrances
Employees	(Data as of 2008)
	Total 10

2009 Survey Response: None

Available information: Avon provided employment figures in 2005 and 2004, but has never completed the full Northern Ireland Service survey. Avon was not listed in recent Equality Commission employers' registers, indicating that it has fewer than 11 employees. The company has expanded its sales force worldwide in the last few years, but only marginally in Northern Ireland. Avon employees typically work from home and it is likely that there is no company office in Northern Ireland. Avon said inAvon has said it aims "to comply with legal requirements and avoid any discrimination at all levels."

Underrepresentation analysis: The Northern Ireland Service does not assess the demographics of workplaces with fewer than 30 employees.

Baxter International

MacBride Agreement	No	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Baxter

Location	Belfast and Antrim	
Business	sales and distribution; kidney dialysis	
Employees	(Data as of 2008)	
	Total	8

2009 Survey Response: None

Available information: Baxter International, which has a small Baxter Healthcare office in Belfast, helped fund a new kidney failure treatment unit in Antrim Hospital in November 2000. Baxter sent letters in 2008, 2005, 2003 and 2002 that verified the size of its work force, but it has not completed the Northern Ireland Service survey. Employment grew from 10 employees in 2003 to 15 in 2005, but has fallen in subsequent years to eight in 2008. Baxter's employees in Northern Ireland work at a sales and distribution center in Belfast and at a kidney dialysis center in partnership with the Antrim hospital.

Compliance with NI fair employment law and Code of Practice: The company says its global business practice standards and sustainability reports display the company's "dedication to our people and communities around the world." In addition, in 2002 the company supplied information about a strategic partnership between the Royal Hospitals Trust in Northern Ireland and the Western Health Board in the Republic of Ireland. Baxter gave \$200,000 to the initiative that is to "leverage clinical expertise and resources to increase access to quality, affordable health care," in a cross-border effort designed to support the aims of the Good Friday peace accord. The company did not provide enough information on its practices for the Northern Ireland Service to determine if they are in line with the Northern Ireland's fair employment law, although the company clearly supports the concept of workplace diversity throughout its operations worldwide. In its global business practice standards manual, Baxter says its employment practices are "guided by our commitment to treating all employees with dignity and respect." It also pledges its commitment to "fair opportunity for all employees" and seeks to "unite a culturally diverse work force." It says it values "the unique contributions of all individuals, recognizing the diversity of our work force as a competitive advantage."

Underrepresentation analysis: The Northern Ireland Service does not assess the demographics of workplaces with fewer than 30 employees.

Conformance with MacBride principles: Baxter has not received a shareholder proposal to implement the MacBride principles, the most common route to compliance. The company did not respond specifically to questions about adherence to the MacBride principles, and it has not provided the reporting on its work force that is expected of companies that are compliant with the principles.

Affirmative action outreach - It is unclear if affirmative action measures are warranted. The company does not appear to have any such measures in place.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal. Although it does not appear to have a separate grievance policy, the company provided copies of its global business practice standards manual, which includes a section on workplace harassment and diversity. The manual advises that "any discrimination should be reported to the employee's supervisor, human resources representative, or any management employee," and stipulates that employees can bypass a supervisor suspected of discriminatory practices. Employees can also contact a regional business practice committee member for help.

Black & Decker

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- **Black & Decker Ltd.**

Location	employees work from home
Business	sales
Employees	(Data as of June 2008)
	Total 4

2009 Survey Response: None

Available information: Black & Decker has regularly confirmed that there have been minimal or no changes in its presence in Northern Ireland, but has not fully responded to the Northern Ireland Service's surveys. The company sold its UK service centers, including its Northern Ireland operation, in 1996. All four sales employees work from home and Black & Decker has no assets in the province. There appear to be no fair employment concerns at the company.

Broadsoft

MacBride Agreement	No	Underrepresentation		FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

- Broadsoft**

Location	Belfast
Business	Voice over IP
Employees	(Data as of 2008)
	Total 10

2009 Survey Response: None

Available information: In 2006, BroadSoft located its European headquarters in Belfast, with the support of InvestNI. In October 2009, the company confirmed further expansion plans, supported by InvestNI, that will see up to 23 software developers employed within the next three to five years. The new office was inaugurated in November 2009.

Chevron

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Dec-1991	Affirmative Action	NA	FET Settlements	0

• Texaco

Location	Belfast terminal, 60 service stations
Business	marketing and distribution of petroleum products
Employees	(Data as of July 2008)
	Total 2

2009 Survey Response: None

Available information: In previous years, Texaco reported that it had two employees at its directly owned Texaco Ltd. subsidiary, which markets and distributes petroleum products from a facility in the Belfast docks area. The company did not provide an updated staff count in its most recent correspondence with the Northern Ireland Service.

There are 70 directly supplied Texaco retail service stations, most of which are run by independent dealers with fuel sales contracts. Texaco also supplies fuel to an additional 19 sites through an authorized dealer network. It reports that many of the service stations in Northern Ireland are sole proprietorships with just one location, and that Chevron does not have records of how many people work at each site. Assuming each site has between three and five workers, there would be anywhere from 237 to 395 people working at Texaco stations around Northern Ireland.

Compliance with NI fair employment law and Code of Practice: The company "has no responsibility" for "employment practices or requirements" at the stations operated by independent agents as it "does not own any of the properties or any part of the business." At the sites it does own, the independent operators "are responsible for employment practices and requirements." At the 19 sites in the authorized dealer network, each operator "is responsible for employment practices and requirements." The company says that its staff "maintain high ethical standards in regard to our employees and expect our business partners to act in a responsible, ethical manner towards employees and to comply with all legal requirements."

Underrepresentation analysis: No information is available on the religious breakdown of the company's workers in Northern Ireland. Making any assessment of fair representation at the company's various operations would be problematic in any case because most of the sites are run by independent operators.

Conformance with MacBride principles: The company reached an agreement on MacBride compliance with investor advocates of the principles in 1991. It says it observes the principles "as appropriate and consistent with the legal framework."

Affirmative action outreach - No affirmative action measures are warranted.

Grievances -No fair employment grievances have been filed against the company.

Citigroup

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Aug-2001	Affirmative Action	NA	FET Settlements	0

• CitiFinancial Europe PLC

Location	Derry, Lisburn, Belfast	
Business	financial services	
Employees	(Data as of July 2008)	
	Total	6

2009 Survey Response: None

Available information: Citigroup's U.K. subsidiary, CitiFinancial Europe, has a small presence in Northern Ireland, providing consumer financial services in offices in Belfast, Portadown, Newtownabbey and Newtownards. The company was formerly called Associates Capital. Citigroup provided a complete survey response and has given the Northern Ireland Service copies of its fair employment and harassment policies.

Compliance with NI fair employment law and Code of Practice: The company says that it adheres to Northern Ireland fair employment law and follows the recommendations of the Code of Practice. The EEO policy says the company will not discriminate in any aspect of employment. Further, it says the company is "committed beyond its statutory requirements to eliminate discrimination and disadvantage amongst its employees," and that the policy must have employees' active participation to be effective. The policy provides detailed descriptions of what constitutes direct and indirect discrimination, although its references to applicable statutes do not include the Northern Ireland fair employment law. Although the policy is dated December 2001 and post-dates this law, the policy does say that in Northern Ireland, "reasonable efforts must be made to ensure that termination procedures do not penalize a minority group."

CitiFinancial Europe uses job agencies to advertise vacancies, rather than placing recruitment ads directly itself. It may use an interview panel to select candidates, but given its small size this is probably difficult. The company's legal department reviews redundancies to determine their impact on equal opportunities issues before they are implemented. All employees receive comparable training, which the company monitors. The district manager is "aware of all the responsibilities" imposed by the company's EEO policies and reports up the chain of command. The company has no trade unions, and has not consulted with workers on fair employment matters, but has discussed its policies with the Equality Commission.

Underrepresentation analysis: The Northern Ireland Service does not assess the demographics of the work force if it falls under a 30 person threshold. CitiFinancial did not take any applicants or new hires in the most recent monitoring period.

Conformance with MacBride principles: The company reached an agreement on implementation of the principles in 2001. It says that it ensures the principles are implemented by recording applicant data and that hiring decisions are based on objective criteria.

Affirmative action outreach - No affirmative action efforts appear to be warranted.

Grievances - No recent complaints have been filed against the company at the FET. The company's grievance procedure calls for employees to report policy violations to the human resources department or the company's internal audit department at U.K. headquarters. It allows employees to bring confidential complaints and to raise issues with someone other than their direct manager. The policy prohibits victimization directed against those who complain, and allows complaints to be made anonymously. The procedures are detailed and precisely lay out for employees how to bring a complaint and how it will be handled in a timely fashion.

ConocoPhillips

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1992	Affirmative Action	NA	FET Settlements	0

- **ConocoPhillips Ltd.**

Location	Belfast
Business	oil distribution
Employees	(Data as of 2008)
	Total 1

2009 Survey Response: None

Available information: ConocoPhillips' Northern Ireland operation was owned by DuPont--which had reached an accommodation on the MacBride principles with shareholder activists in 1992--until 1999. ConocoPhillips has been downsizing its operations in Northern Ireland and it retains only one employee.

DTS Inc.

MacBride Agreement	No	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

- **DTS Europe**

Location	Bangor
Business	entertainment technology
Employees	(Data as of 2008)
	Total 10

2009 Survey Response: None

Available information: The company has a facility in Bangor, according to its website 2008 Form 10K, but it does not appear in Equality Commission publications, indicating it employs fewer than 11 workers. The company did not respond to inquiries from the Northern Ireland Service and no further information is available about the operation.

Dun & Bradstreet

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- Dun & Bradstreet Ltd.**

Location	Bangor, Co. Down
Business	credit services information
Employees	(Data as of August 2008)
	Total 3

2009 Survey Response: None

Available information: Dun & Bradstreet answered the Northern Ireland Service survey in 2008. The company says that its practices adhere to Northern Ireland fair employment law, but it never agreed to MacBride implementation and opposed shareholder resolutions on the subject over the years. The company's policies follow good employment practices and provide appropriate training to staff on EEO issues. No group has appeared to be underrepresented at D&B, no problems have surfaced about neutral workplace conditions and no grievances have been filed against the company.

Expeditors International of Washington Inc.

MacBride Agreement	No	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

- **Expeditors International (UK) Ltd.**

Location	Belfast
Business	freight forwarding
Employees	(Data as of 2008)
	Total 10

2009 Survey Response: None

Available information: Expeditors International of Washington appears to employ fewer than 11 workers since the company has not registered with the Equality Commission. The Belfast company has not responded to requests for further information from the Northern Ireland Service. No information is available about the firm's policies regarding fair employment. No complaints have been filed against the company at the Fair Employment Tribunal.

F5 Networks Inc.

MacBride Agreement	No	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

- F5**

Location	Belfast
Business	IT product development
Employees	(Data as of 2008)
	Total 10

2009 Survey Response: None

Available information: F5 Networks bought Swan Labs in 2005 and took over its development and support operations in Belfast. The company's main business in Belfast is product development. F5 Networks responded to the Northern Ireland Service survey for the first time in 2006, but provided very little information; the company did not respond in 2007 or 2008. F5 was not listed in the Equality Commission's 2007 Register of Employers, indicating that it has fewer than 11 employees, down from 15 in 2006. No fair employment grievances have been filed against the company.

General Electric

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Sep-1998	Affirmative Action	Yes	FET Settlements	0

• GE Capital Woodchester (NI)

Location	Belfast
Business	auto leasing
Employees	(Data as of Nov. 2008)
	Total 5

2009 Survey Response: None

Available information: The company's most recent full response to the Northern Ireland Service survey was in 2004. GE has said Woodchester's policies adhere to fair employment law in Northern Ireland. All managers are fully briefed on policies and procedures of equal opportunity and sectarian harassment. Managers in Northern Ireland are responsible for "developing and promoting a fair place of work" while senior management in the Dublin head office have oversight and "ensure objectivity in recruitment and grievance handling."

The company's hiring and selection processes seem to adhere to Northern Ireland's fair employment law. Employment at this subsidiary has dropped precipitously and now stands at five. Given its small size, the company does not report data on the religious composition of its work force.

General Electric has a MacBride implementation agreement applicable to its three wholly owned subsidiaries, including GE Capital Woodchester. The company's office is located in a business complex in south Belfast, an area generally considered neutral ground. The company has a policy on sectarian harassment that it circulates to all employees. Sectarian harassment is a disciplinary offense that could result in dismissal. The general manager is responsible for all grievances raised through the formal complaints procedure. Employees who believe they have been inequitably treated may raise grievances at the senior management level and locally or directly with the human resources department.

No discrimination complaints have been filed against the company since 2000.

Goodyear Tire & Rubber

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Nov-2000	Affirmative Action	?	FET Settlements	0

• Goodyear Dunlop Tyres UK Ltd.

Location	not disclosed	
Business	tire services and sales	
Employees	(Data as of 2009)	
	Total	1

2009 Survey Response: Partial

Available information: Before 2002, Goodyear had a stake in a Northern Ireland firm called Dunlop Tyres through a joint venture with Sumitomo Rubber Industries; this venture was dissolved and the retail operations sold to third parties in 2002. The company responded to the 2008 survey with a letter confirming it has one sales employee in Northern Ireland, and no other employees located in Northern Ireland. Therefore, the company did not see pertinent to provide any further detailed information. Goodyear also has franchises in Northern Ireland operating under the Hi-Q Tyre Service name (profiled in Section I).

Goodyear said to RiskMetrics in 2009 that "with respect to the remaining limited employment, consistent with past practice, Goodyear Dunlop Tyres Limited UK intends, consistent with existing law, to implement fair employment practices embodied in the MacBride principles." The New York City Comptroller's office added the company to its list of firms with agreements on implementation in 2000, given this statement and the company's cooperation with monitoring by the Northern Ireland Service.

Goodyear Great Britain was at one time a major Northern Ireland employer, but it closed a large manufacturing plant there in the early 1980s. It is the company's view that "Given these remaining de minimus contacts in Northern Ireland, it doesn't seem pertinent to provide any further detailed information."

Hallmark Cards

MacBride Agreement	No	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

- **Hallmark Cards PLC**

Location	sales people appear to work from home
Business	sales
Employees	(Data as of 2008)
	Total 10

2009 Survey Response: None

Available information: Hallmark Cards Inc., a privately held company, responded to the Northern Ireland Service survey in 2005 and 2004. At the time, the company reported that it had "around 20 employees" in Northern Ireland, but it was not listed in recent Equality Commission Employers' registers, indicating that it now has fewer than 11 employees.

Hallmark told the Northern Ireland Service that it adheres to an EEO policy regarding "fairness and equitability of all employees regardless of gender, race, age, religious beliefs and sexual orientation." It also said it adheres to the fair employment law and its regulations. No complaints have been filed against the company at the Fair Employment Tribunal.

Honeywell International

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1990	Affirmative Action	NA	FET Settlements	0

• Honeywell Process Solutions

Location	Belfast
Business	customer assistance
Employees	(Data as of 2009)
	Total 10

2009 Survey Response: None

Available information: The company last responded to the survey in 2002 when it reported a Belfast work force of six employees, the same size it had been in 2000. The company was not listed in the Equality Commission's 2009 Register of Employers, indicating that it has fewer than 11 employees.

In 2000, Honeywell said that four of the employees were service engineers who traveled to assist customers, and two people staffed the office in Belfast. Honeywell said that information on the religious composition of its work force is not available since it does not require its employees to disclose their religious affiliation. Honeywell's fair employment policies appear consistent with the Code of Practice. Unlike most small employers, Honeywell includes an EEO statement in recruitment advertising. Little significance can be attached to a work force of this size even it is comprised of all Protestants or all Catholics, given the small number of employees. The company agreed to take "all possible lawful efforts to implement the fair employment standards embodied in the MacBride principles" in 1990 and continues to do so, it reported. No grievances have been filed against it at the Fair Employment Tribunal.

IAC/Interactive

MacBride Agreement	Yes	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date	Dec-2006	Affirmative Action	NA	FET Settlements	0

• Ticketshop (NI) Ltd.

Location	Belfast
Business	Ticket sales
Employees	(Data as of 2008)
	Total 2

2009 Survey Response: None

Available information: The company has a very small presence in Northern Ireland with only two employees. The company reports that its policies reflect the MacBride principles and it agreed to comply with monitoring by the Northern Ireland Service. IAC has a harassment policy that complies with fair employment laws in Northern Ireland and sets out the procedures for addressing complaints. Employees can raise issues with a supervisor, a member of the human resources staff or another manager with whom the employee would feel more comfortable. No fair employment grievances have been filed against the company.

Illinois Tool Works

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- **Signode Ireland Ltd.**

Location	Craigavon, Co. Armagh
Business	steel & plastic strapping equipment, services
Employees	(Data as of 2007)
	Total 4

2009 Survey Response: None

Available information: Illinois Tool Works' wholly owned subsidiary Signode Ireland Limited is a small operation in Craigavon. It has a full-time staff of four workers. The company responded to the Northern Ireland Service in 2006 and 2007, after a gap of several years, but did not respond in 2008 or 2009. The operation sells and distributes steel and plastic strapping, seals, air bags, stretch film, hand tools and power strapping machines. ITW has declined to provide information on the religious breakdown of its work force, saying it does not inquire about employees' "religious persuasion." ITW reported in 2006, "We do not enquire as to the religion of our employees either before or during their employment, and believe we have no right to do so. We have never received any complaints from our staff regarding discrimination and given that the company is managed from [Ireland] it is improbable that any such incident would arise, or not be reported." ITW says it bases all personnel decisions on merit, and managers have found no fair employment problems at Signode. ITW has said the operation adheres to the MacBride principles "provided they do not contravene" Northern Ireland's fair employment law. No complaints have been filed against the company at the Fair Employment Tribunal.

Interpublic Group

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Weber Shandwick Northern Ireland

Location	Belfast
Business	public relations
Employees	(Data as of Aug 2008)
	Total 7

2009 Survey Response: None

Available information: Interpublic has responded in full to the Northern Ireland Service survey for the last several years, providing detailed information on its policies and work force breakdown. The company first identified this public relations subsidiary in its 2002 proxy statement; it then provided a response to the survey later in the year. Interpublic's main operation in Northern Ireland, McCann-Erickson, was bought out by management in March 2004.

Compliance with NI fair employment law and Code of Practice: The company says its practices follow guidelines set out by the Equality Commission and the Code of Practice. All employees are notified of positions open to internal applicants and all jobs are publicly advertised in the Belfast Telegraph. The company uses interview panels with cross-community representation when screening applicants, and the applicants and new hires are analyzed according to community success rates. Not all employees engaged in hiring receive EEO training, however. The company says employees are hired and promoted based solely on "merit." The local managing director and the account manager oversee fair employment matters at the company. Weber says its training requirements are "assessed under the investors in people model."

Underrepresentation analysis: No group appears to be underrepresented.

Conformance with MacBride principles: Weber Shandwick has said in its survey responses that its practices reflect the MacBride principles standards and that it would reply to monitoring inquiries by the Northern Ireland Service. But it also said, "we have not formally adopted the MacBride principles." A shareholder resolution asking Interpublic Group to implement the MacBride principles received support from 11.1 percent of the shares voted in 2004.

Affirmative action outreach - No affirmative action efforts appear warranted.

Grievances -No grievances have been filed against the company at the Fair Employment Tribunal.

Johnson & Johnson

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Johnson & Johnson

Location	sales people appear to work from home	
Business	pharmaceutical sales	
Employees	(Data as of 2009)	
	Total	3

2009 Survey Response: Full

Available information: In its 2009 Survey Response, Johnson & Johnson said it still has "a few sales representatives in Northern Ireland." The company has said other survey questions are not applicable to its operations because it "has no companies, plants or operations based in Northern Ireland...and accordingly no related work force in Northern Ireland." No grievances appear to have been filed against the company at the Fair Employment Tribunal.

Kellogg

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- **Kellogg Co. of Great Britain**

Location	sales employees work from home	
Business	breakfast cereals	
Employees	(Data as of 2008)	
	Total	4

2009 Survey Response: None

Available information: Kellogg told the Northern Ireland Service it has four employees in Northern Ireland, working from home as sales people. The employees sell breakfast cereals. The company said in 2006 that it has "not endorsed the MacBride principles, but [is] a reasonable employer in all respects," adding in 2008 that it "operates to the highest international standards and does not discriminate on any basis." No discrimination complaints have been filed against the company at the Fair Employment Tribunal.

Kiel Laboratories

MacBride Agreement	No	Underrepresentation	?	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Kiel Laboratories

Location	Carrickfergus
Business	pharmaceutical manufacturing
Employees	(Data as of 2009)
	Total 10

2009 Survey Response: None

Available information: InvestNI announced in December 2004 that privately held Kiel Laboratories Inc., of Gainesville, Ga., had begun recruiting staff for a new pharmaceutical manufacturing plant in Carrickfergus. The company, based near Atlanta, said that it expected to create up to 100 jobs within two to three years from the £5 million investment--however, the company has not yet been listed in the Equality Commission's Register of Employers, indicating that it still has fewer than 11 employees. It will make extended release prescription drug products for treating coughs, colds and allergies, for sale in the United States and in Europe in the future. Ian Pearson, the British minister responsible for enterprise, trade and investment, said "Kiel Laboratories is a young, dynamic, fast growing company that has benefited from its focus on research and development." Pearson said the government is supporting the venture but the press release did not provide details. Jeffrey Kiel, who owns the company, said the investment would provide a gateway to Europe for his firm, and that collaboration with Northern Ireland's universities and the investment assistance from the government influenced his decision to locate in Northern Ireland. The company's website says the firm is a "fully-integrated pharmaceutical organization. The company's current generic and brand product line targets pediatric and adult forms of pulmonary and respiratory disease." The company has not responded to any inquiries for information about its operations in Northern Ireland from the Northern Ireland Service. It registered with the Equality Commission in March 2004.

Koch Industries

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	No	FET Settlements	0

- **Invista**

Location	Derry, Co. Londonderry
Business	Synthetic materials
Employees	(Data as of 2009)
	Total 10

2009 Survey Response: None

Available information: Invistia, acquired by Kansas-based Koch Industries from DuPont in 2004, manufactures Lycra. Employment has fallen from a high of 1,470 in 1993 to fewer than 26 by 2008 and fewer than 11 by 2009.

Grievances -There have been no discrimination cases filed against the company since 2003.

Kraft Foods Inc.

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1995	Affirmative Action	No	FET Settlements	0

• Kraft Foods (UK) Ltd.

Location	workers apparently work from their homes; no headquarters facility	
Business	food product sales	
Employees	(Data as of July 2006)	
	Total	4

2009 Survey Response: None

Available information: Altria spun off Kraft Foods Inc. in 2007 and it is now traded independently on the New York Stock Exchange. The company reported that it employs four sales people (two Protestants and two Catholics) in Northern Ireland; the company was not listed in recent Equality Commission Employers' Registers, indicating that it has fewer than 11 employees. Kraft imports and sells products made at other European locations. Kraft's employees work from home, and its work force breakdown is consistent with a catchment area that encompasses the entire province. Few conclusions can be drawn from a work force that is so small, however. Altria says it complies with Northern Ireland's fair employment law. It transferred responsibility for the company's Northern Ireland operations from a Dublin office to a Cheltenham, England, office in 1998. The company does not maintain formal records of its employees' religion but has deduced the monitoring information from employee addresses. The company need not comply with monitoring requirements as it has fewer than 11 workers. Kraft uses a recruitment consultant to fill job openings; hiring decisions are "based upon the very same non-discrimination employment criteria upon which the company relies worldwide." The company reached an agreement with MacBride proponents in 1995, after investors withdrew a shareholder resolution asking the company to implement the principles. No complaints have been filed against the company at the Fair Employment Tribunal.

Lilly (Eli)

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- **Lilly (Eli) & Co.**

Location	sales people work from home
Business	pharmaceuticals
Employees	(Data as of 2009)
	Total 10

2009 Survey Response: None

Available information: Eli Lilly's operation in Northern Ireland is part of Eli Lilly & Co. (Ireland) Ltd. Employees work as sales representatives from home. Lilly told the Northern Ireland Service in 2005 that its policies and practices follow the recommendations and requirements of the Code of Practice and that no grievances have been filed, but noted that it has not "subscribed to" the MacBride principles. In 2005, Lilly reported 11 employees, but since then it has not been included in the Equality Commission's register of employers, indicating that the firm now employs fewer than 11 people.

As an employer with only a minimal presence in Northern Ireland, the company has received no MacBride shareholder proposals, the usual prompt to agreements on implementation of the principles. No discrimination cases have been filed against the company at the FET.

Manpower Inc.

MacBride Agreement	No	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date		Affirmative Action	?	FET Settlements	0

• Right Management

Location	Belfast
Business	management consulting
Employees	(Data as of 2008)
	Total 5

2009 Survey Response: None

Available information: Right Management has a small office in Belfast at Clarendon Docks, a neutral location close to downtown, that employs fewer than 11 workers. Manpower Inc. lists the office on its website but it is not registered with the Equality Commission and has not appeared in any of the commission's reports on fair employment. The company has not responded to the Northern Ireland Service annual survey. No complaints have been filed against the company at the Fair Employment Tribunal. A shareholder resolution asking Manpower Inc. to adopt the MacBride principles for Right Management and its much larger Manpower PLC subsidiary got 13.2 percent support in 2008. The company said, "In effect, Manpower's policies and applicable laws endorse the same believe in equality of opportunity that is embodied in the MacBride principles." But, like other companies that have opposed MacBride resolutions, it argued that adopting the principles would make it "unnecessarily accountable to different sets of overlapping fair employment guidelines."

Mars

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

- **Mars**

Location	sales people appear to work from home
Business	sales
Employees	(Data as of 2009)
	Total 2

2009 Survey Response: None

Available information: Mars, a privately held company, told the Northern Ireland Service in 2001 that it still had just two sales people in Northern Ireland. Mars has no facilities in Northern Ireland, and has said "it is corporate policy that all of our units around the world follow the applicable laws of the countries of which they are citizens." The company also has said that "discrimination is anathema to Mars Inc. and to all of its units." Mars has not responded to the Northern Ireland Service survey since 2001. The company was not listed in the Equality Commission's Register of Employers for the past several years, indicating that it has continued to employ fewer than 11 people. No complaints have been filed against the company at the Fair Employment Tribunal.

MiMIX Broadband

MacBride Agreement	No	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date		Affirmative Action	NA	FET Settlements	0

• Celeritek UK

Location	Belfast
Business	semiconductor circuit design
Employees	(Data as of 2009)
	Total 10

2009 Survey Response: None

Available information: MiMIX Broadband bought Celeritek and with it its UK design center in Belfast in June 2005, and responded to the the Northern Ireland Service survey that year. It has not responded since.

MiMIX, based in Houston, Texas, makes high-frequency radio products used in cellular infrastructure, satellite and other wireless communications systems for civilian and military use. In September 2005, the company reported that it had seven employees. In recent years, the firm has not been listed in the Equality Commission's Register of Employers, indicating that it still has fewer than 11 employees.

Compliance with NI fair employment law and Code of Practice: MiMIX says it adheres to the standards established by Northern Ireland's fair employment laws and the Code of Practice. It publicly advertises and notifies employees of available positions. Job openings are advertised in local and regional papers as well as on the company intranet. A panel representing both communities of the company's staff interviews potential candidates, which must take considerable effort given the company's small size. All employees receive training on sectarian harassment and intimidation with materials from the Equality Commission, but not all employees that are involved in candidate selection receive EEO training. MiMIX does not review the religious composition of its applicants. Its Belfast office reports to a manager located in California, who attended Queen's University in Belfast.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions about companies with fewer than 30 employees whose religious affiliation is identified.

Conformance with MacBride principles: The company says its policies reflect the principles embodied by the MacBride principles, but it declined to complete the survey in 2006 or 2007. It has not received a shareholder resolution asking it to adopt the principles, the usual route to agreement.

Affirmative action outreach - No affirmative action measures appear warranted.

Grievances -No discrimination complaints have been filed against the company at the Fair Employment Tribunal.

NCR

MacBride Agreement Agreement Date	No	Underrepresentation Affirmative Action	No NA	FET Discrimination Findings FET Settlements	0 0
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- **NCR Ltd.**

Location	Belfast
Business	cash register, computer, terminal sales
Employees	(Data as of 2009)
	Total 10

2009 Survey Response: None

Available information: The company last responded to the Northern Ireland Service survey in 1997 following its spin-off from AT&T in January 1997; therefore, no current information is available on the work force breakdown. The company's 2002 proxy statement indicated that it had fewer than 10 workers in Northern Ireland, a fact borne out by the company's exclusion from the Equality Commission's annual Register of Employers in the past several years. In 1992, AT&T reached an agreement with shareholder activists to implement the MacBride principles at this operation, but NCR has no such arrangement and opposed a shareholder resolution asking it to implement the MacBride principles in 2002. The resolution received 14.1 percent of the shares voted. NCR said in its 2002 proxy statement that its current policies and actions demonstrate its commitment to providing equality of opportunity and that "endorsement or implementation of the MacBride principles is not necessary." With some exceptions, the company's practices outlined in past survey responses appeared to follow most fair employment guidelines in the Code of Practice. NCR moved its office to East Belfast in 1997 to provide "improved office accommodation." East Belfast can be intimidating to some Catholics, unlike the company's former location in the downtown area. The company said it maintained a neutral workplace by "implementation of NCR shared values, availability of grievance procedures and reinforcement of normal good standards of behavior." No fair employment grievances have been filed against the company.

Omnicom Group

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Jan-2002	Affirmative Action	NA	FET Settlements	0

• Drury Communications

Location	Belfast
Business	public relations
Employees	(Data as of 2009)
	Total 0

2009 Survey Response: Full

Available information: In October 2000, Omnicom Group Inc. subsidiary BBDO Worldwide acquired Dublin-based Drury Communications, which owned 30 percent of a Belfast firm by the same name. The Belfast company, a public relations firm, had 15 workers at the time; that number has since fallen below 10. Omnicom has written on Oct. 20, 2009 to the Northern Ireland Service, saying that they no longer have interest in any Northern Ireland entities.

Compliance with NI fair employment law and Code of Practice: Drury Communications says its policies adhere to both the recommendations and the standards set out in the Fair Employment and Treatment (Northern Ireland) Order 1998. The company did not provide detailed information about its hiring and selection procedures, but it did say that it advertises openings in all three Belfast daily newspapers, ensuring both communities are made aware of vacancies. Its policy states that the company will periodically review its selection criteria and procedures so that "individuals are selected, promoted and treated solely on the basis of their merits and abilities which are appropriate to the job." Managers and staff involved in recruitment, employee administration and training are charged with the responsibility of ensuring the enforcement of the non-discrimination policy.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

Conformance with MacBride principles: In January 2002 the company reached a MacBride implementation agreement and the New York City pension funds withdrew a shareholder resolution on the subject.

Affirmative action outreach - It does not appear that any affirmative action efforts are necessary.

Grievances -No grievances had been filed at the Fair Employment Tribunal against Drury Communications. The company maintains a grievance procedure for any employees who feel they have received inequitable treatment.

Procter & Gamble

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-1991	Affirmative Action	NA	FET Settlements	0

• P&G, P&G Health & Beauty Care, Max Factor

Location	sales people work mostly from home	
Business	sale of consumer products	
Employees	(Data as of Aug 2008)	
	Total	5

2009 Survey Response: None

Available information: The company has provided some general information on its employment policies and the size of its work force. The total work force has decreased considerably in recent years, from 29 in 1999 to four according to the most recent available data. Procter & Gamble previously told the Northern Ireland Service that "the split between employees on whether they belong to the Protestant or Catholic community is roughly 50/50." Most employees work out of their homes, and some are beauty consultants working out of retail establishments. The company reached an agreement with shareholders on MacBride implementation in 1991. It told the Northern Ireland Service in 2002 that it is "committed to equal opportunity and fair employment" and is making "all necessary and lawful efforts to implement the MacBride principles." The company reported that specific questions on adherence to the Code of Practice and implementation of the MacBride principles "are more appropriate to companies with more significant operations in Northern Ireland." No fair employment grievances have been filed against the company.

United Technologies

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Jan-2001	Affirmative Action	Yes	FET Settlements	0

• Toshiba Carrier UK

Location	Belfast
Business	air conditioning/refrig. installation & maintenance
Employees	(Data as of Aug. 2008)
	Total 11

2009 Survey Response: None

Available information: Employment at Toshiba Carrier has remained steady at around 10 employees for the past several years.

Compliance with NI fair employment law and Code of Practice: The company says it adheres to Northern Ireland fair employment law and the Code of Practice and it has provided copies of its policies to the Northern Ireland Service. Job advertisement, hiring and neutral workplace policies appear to be consistent with good practices recommended by fair employment experts in Northern Ireland. Employees involved in personnel decisions have all received training on EEO matters.

UTC says that it is "very concerned that it is seen as and operates as an Equal Employment Opportunity employer." The company also says that it "issues a welcoming statement and EEO statement in ads concerning vacancies" and that "whoever applies for a job is judged and appointed on merit and not any other consideration." In 2001, Toshiba Carrier adopted a new EEO policy that the new human resources director drafted based on the MacBride principles and UK legislation. This has been regularly updated and circulated to all employees and is included in all new employee orientation packs, displayed on notice boards and available on the company intranet.

Underrepresentation analysis: The Northern Ireland Service refrains from drawing conclusions on community representation when the work force has fewer than 30 employees.

Conformance with MacBride principles: The company reached an accord on MacBride implementation with activists in 2001, following negotiations on a shareholder resolution that was withdrawn. The company had opposed shareholder resolutions on the subject in 2000, 1999 and 1994.

Affirmative action outreach - The company's small size makes it impossible to draw conclusions about the community representation in its work force. Even so, UTC reports that "Toshiba Carrier UK has adopted a variety of job advertisements and candidate attraction techniques in order to redress the balance."

Grievances -No complaints have been filed against Toshiba Carrier at the Fair Employment Tribunal.

Visteon

MacBride Agreement	Yes	Underrepresentation	Yes	FET Discrimination Findings	0
Agreement Date	Mar-1998	Affirmative Action	No	FET Settlements	0

• Visteon UK Ltd.

Location	Belfast
Business	Intake manifold, air and fuel products
Employees	(Data as of 2009)
	Total 25

2009 Survey Response: None

Available information: In March 2009, Visteon UK, operator of the Belfast Visteon plant and two other plants in Great Britain, filed for insolvency. The company's assets were placed under receivership and the Belfast plant was shut down, with workers being given only six minutes, according to some news accounts, to leave the plant floor. Visteon still appeared in the September 2009 Register of Employers, implying a skeleton staff at its Belfast plant.

Grievances -Nine complaints have been filed against Visteon at the Fair Employment Tribunal since 2003. Two complaints were conciliated and the rest were withdrawn. The company's grievance policy allows for employees to make complaints confidentially and to bring issues to someone other than their direct supervisor.

Welch Allyn

MacBride Agreement	Yes	Underrepresentation	No	FET Discrimination Findings	0
Agreement Date	Dec-2008	Affirmative Action	NA	FET Settlements	0

- **Welch Allyn UK Ltd.**

Location	Hillsborough, Co. Down
Business	medical electronics/engineering
Employees	(Data as of 2008)
	Total 1

2009 Survey Response: None

Available information: The company reported that in 2008 it had only one employee in its Hillsborough offices south of Belfast, down from three in 2000. The company designs patient monitoring software and hardware. It is too small to fall under the monitoring requirements of Northern Ireland's fair employment law, but says it adheres to the Code of Practice. No grievances have been filed against the company on fair employment grounds. Welch Allyn says it adheres to the MacBride principles, although it does not have a formal agreement with MacBride advocates on the subject. The company did not respond to the Northern Ireland Service's 2009 survey, however.

APPENDIX A

THE MACBRIDE PRINCIPLES FOR NORTHERN IRELAND

"In light of decreasing employment opportunities in Northern Ireland and on a global scale, and in order to guarantee equal access to regional employment the undersigned propose the following equal opportunity/affirmative action principles:

- Increasing the representation of individuals from underrepresented religious groups in the workforce including managerial, supervisory, administrative, clerical and technical jobs.
- Adequate security for the protection of minority employees both at the workplace and while traveling to and from work.
- The banning of provocative religious or political emblems from the workplace.
- All job openings should be publicly advertised and special recruitment efforts should be made to attract applicants from underrepresented religious groups.
- Layoff, recall, and termination procedures should not in practice favor particular religious groupings.
- The abolition of job reservations, apprenticeship restrictions, and differential employment criteria, which discriminate on the basis of religion or ethnic origin.
- The development of training programs that will prepare substantial numbers of current minority employees for skilled jobs, including the expansion of existing programs and the creation of new programs to train, upgrade, and improve the skills of minority employees.
- The establishment of procedures to assess, identify, and actively recruit minority employees with potential for further advancement.
- The appointment of a senior management staff member to oversee the company's affirmative action efforts and the setting up of timetables to carry out affirmative action principles."

Sean MacBride -- Dublin, Ireland

Dr. John Robb -- Ballymoney, Northern
Ireland Inez McCormack -- Belfast, Northern
Ireland Fr. Brian Brady -- Belfast, Northern
Ireland

APPENDIX B

NEW YORK STATE COMMON RETIREMENT FUND PORTFOLIO U.S. CORPORATIONS DOING
BUSINESS IN NORTHERN IRELAND

3M	Gap	Pitney Bowes
AES	General Electric	Raytheon
Allstate	Goodrich	Regis Corporation
Aon Corp.	Goodyear Tire & Rubber	Sally Beauty Holding, Inc.
AVX	Hewlett-Packard	Schein (Henry) Inc.
Baker Hughes	Interface	Seagate Technology
BE Aerospace	International Business Machines	Sonoco Products
Bemis	Jacobs Engineering Group Inc.	Starbucks Corp.
Black Box Corp.	Lauder (Estee)	TeleTech Holdings
Blackstone Group	Manpower Inc.	Terex
Caterpillar	Marsh & McLennan	TJX
CBS	McDonald's	United Technologies
Chesapeake	Merck	Virgin Media
Chevron	Microsoft	Vornado Realty Trust
Citigroup	Office Depot	Wal-Mart Stores Inc.
Coca-Cola Co.	Omnicom Group	Warner Chilcott PLC
Computer Sciences	Oxford Industries	Watson Pharmaceuticals
Crane	PepsiCo	Xerox
Danaher	Pfizer	Yum Brands
DuPont (E.I.) de Nemours		
Emerson Electric		

APPENDIX C

U.S. COMPANIES WITH AGREEMENTS ON IMPLEMENTATION OF THE MACBRIDE PRINCIPLESCurrently in Northern Ireland (73 firms)

3M	Coca-Cola Co.	Microsoft
Abbott Laboratories	Computer Sciences	Nacco Industries
AES	ConocoPhillips	NTL
Allen Systems Group	Crawford & Co.	Office Depot
Allstate	Danaher	Openwave Systems
American International Group	Disney (Walt)	Oxford Industries
Ametek	DuPont (E.I.) de Nemours	PepsiCo
Aon Corp.	Emerson Electric	Pfizer
Aramark	Gap	Pitney Bowes
Anixter International	General Electric	Procter & Gamble
Art Technologies Group	Goodrich	Seagate Technology
AVX	Goodyear Tire & Rubber	Sonoco Products
Baker Hughes	Hewlett-Packard	Starbucks Corp.
Bemis	Honeywell International	Tech International
Black Box Corp.	IAC/Interactive	TeleTech Holdings
Blackstone Group	Interface	Terex
Blockbuster	International Business Machines	TJX
Borland Software	Jacobs Engineering Group Inc.	United Technologies
Caterpillar	Kraft Foods Inc.	Virgin Media
CBS	Lauder (Estee)	Visteon
Chesapeake	Lockton Inc.	Wal-Mart Stores Inc.
Chevron	Marsh & McLennan	Warner Chilcott
Citigroup	McDonald's	Watson Pharmaceuticals
Clear Channel Outdoor Holdings	Merck	Xerox
		Welch Allyn

No Longer in Northern Ireland (42 firms)

AM International	Fruit of the Loom	Sun Healthcare
AT&T	GATX Corp.	Teleflex
American Home Products	General Motors	TriVirix Intl.
Analog Devices	Household International	Toys 'R' Us
Avery Dennison	KeySpan	Unisys
Bell Atlantic	King Pharmaceuticals	UPS
Berkshire Hathaway	Lockheed Martin	Viacom
Cendant	Marriott International	VF Corp.
Dana	Nynex	Warnaco Group
EMC (was Data General)	Omnicom Group	Waste Management
R.R. Donnelley & Sons	Oneida	Westinghouse Electric
ExxonMobil	PetsMart	Wombat Financial Software Inc.
Federal Express	Sara Lee	
Ford Motor	Shaw Industries	
Fort James	Solectron	

APPENDIX D

STATE LAWS, RESOLUTIONS AND LEGISLATION ON FAIR
EMPLOYMENT IN NORTHERN IRELAND(A) Monitoring (B) Report (C) Shareholder action (D) Investment Guidelines/Discretionary
divestment (E) Mandated divestment (F) Selective contracting

Jurisdiction	A	B	C	D	E	F	Type of Measure	Date
California	x	x	x	x			Law	March 1999
Connecticut	x		x		x		Law	May 1987
District of Columbia	x	x		x			Law	Feb 1993
Florida	x	x		x			Law; modified June 1989	Jul 1988
Illinois	x						Law; expired Sept. 1988	
Kentucky	x			x			Binding resolution	May 1994
Maine	x	x	x				Law; Modified 1991	Apr 1988
Massachusetts	x	x	x				Law	Nov 1985
"						x	Law	March 1995
Michigan			x				Law	Oct 1988
Missouri	x		x				Law	Apr 1994
Minnesota	x		x				Law	May 1994
New Hampshire	x		x	x			Law	Apr 1989
Nebraska	x		x				Law	Apr 1994
New Jersey	x	x	x				Law	Jul 1987
"						x	Law	May 1995
New York	x	x		x			Law	May 1986
"						x	Law	Aug 1992
Pennsylvania	x			x			Law	May 1992
Rhode Island	x	x	x	x			Law	Jul 1987
Texas	x			x			Law	Jun 1993
Vermont	x	x	x				Law	May 1989
Virginia							Nonbinding resolution supports MacBride	Mar 1990

Source: Investor Responsibility Research Center

APPENDIX E

LOCAL LAWS AND RESOLUTIONS
ON FAIR EMPLOYMENT IN NORTHERN IRELAND(A) Monitoring (B) Report (C) Shareholder action (D) Investment Guidelines/Discretionary
divestment (E) Mandated divestment (F) Selective contracting

Jurisdiction	A	B	C	D	E	F	Type of Measure	Date
Albany Cty, NY						x	Ordinance	May 1993
Baltimore, MD			x				Ordinance	Apr 1993
Binghamton, NY						x	Resolution	Jul 1991
Boston, MA						x	Executive order	Aug 1989
	x				x		State "home rule" law	Dec 1990
Burlington, VT	x	x	x	x	x		Resolution	1989
Chicago, IL						x	Ordinance	Feb 1993
Cleveland, OH	x	x				x	Ordinance; amended March 1992	May 1991
Detroit, MI				x			Resolution	Oct 1987
Hartford, CT	x	x	x				Resolution	Mar 1986
Kansas City, MO	x	x					Resolution	Mar 1991
Lackawanna Cty, PA					x		Ordinance	Aug 1990
Minneapolis, MN				x			Ordinance	Jun 1988
Monroe, NY			x	x		x	Resolution	Feb 1991
New Haven, CT	x	x			x		Order; expired	Aug 1989
New York, NY						x	Ordinance	Sep 1991
Omaha, NE	x			x			Ordinance	Apr 1995
Painesville, OH						x	Resolution	Mar 1992
Parma, OH						x	Resolution	Mar 1992
Philadelphia, PA	x	x			x		Ordinance	Hun 1987
Pittsburgh, PA	x			x			Two ordinance	Aug 1988
Rochester, NY	x	x				x	Ordinance	Feb 198
Rockland Cty, NY		x					Resolution on bank ties to Northern Ireland	May 1986
St. Louis, MO	x	x					Ordinance; expired	Apr 1990
St. Paul, MN				x			Policy	Feb 1988
San Francisco, CA	x	x	x			x	Ordinance	Mar 1989
Scranton, PA		x				x	Ordinance	May 1990
Springfield, MA	x		x				Resolution	Apr 1987
Tucson, AZ	x		x				Ordinance	Nov 1988
Wilmington, DE	x		x	x			Ordinance	Feb 1987
Yonkers, NY						x	Ordinance	May 1992

State and City Legislation Enacted on the MacBride Principles

- State legislation enacted
- /○ City legislation enacted



