

Contents

- WMEC Benchmark Data Set
- WMEC Ethics Quotient™ Survey Results

World's Most Ethical Companies as Benchmark Data Set

This Report contains data points from Ethisphere's 2018 World's Most Ethical Companies ("WMEC") data set. This data set provides insights into the programs and practices of leading companies from around the world. The dataset referenced through the Report ("WME Honorees") is comprised of 135 companies.

The Benchmark data set is presented to provide a comparative view into the practices of leading companies. For the full list of WMEC companies visit: http://worldsmostethicalcompanies.ethisphere.com/honorees



Summary Findings

Key Finding #1

While almost all WME Honorees are conducting ethics and compliance due diligence at the time of selection, almost half are not rerunning the due diligence process on a periodic basis for those third parties that pose a material compliance, ethics or reputation risk (at least every three years). The information most commonly taken into consideration during this process is ownership information, ethical track record, use of subcontractors and data security practices.

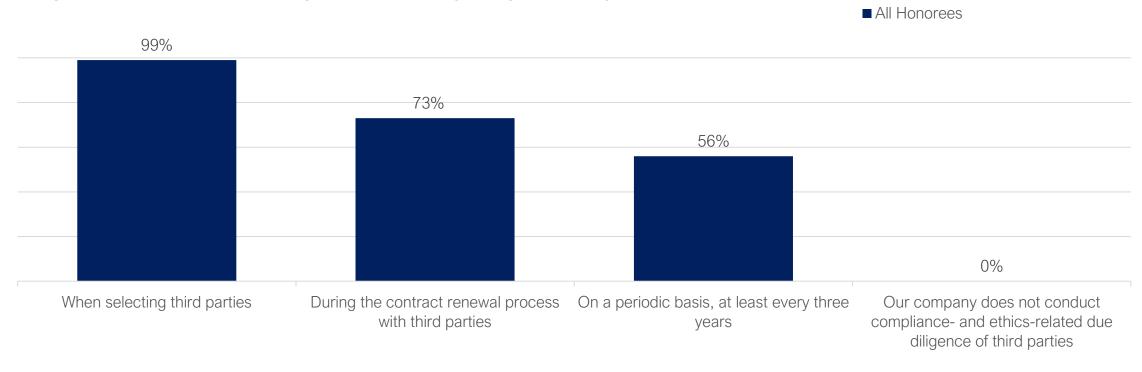
Key Finding #2

A significant percentage (65 percent) of WME Honorees establish compliance and ethics expectations/requirements by requiring the third party to acknowledge and certify compliance with a third party code (which has been established by 84 percent of WME Honorees). A substantial majority (88 percent) additionally includes provisions in its third-party contracts requiring supplier compliance with certain compliance and ethics expectations. Likewise, two-thirds of WME Honorees provide ethics training assistance/resources to these third parties, and deploy communications targeting them.



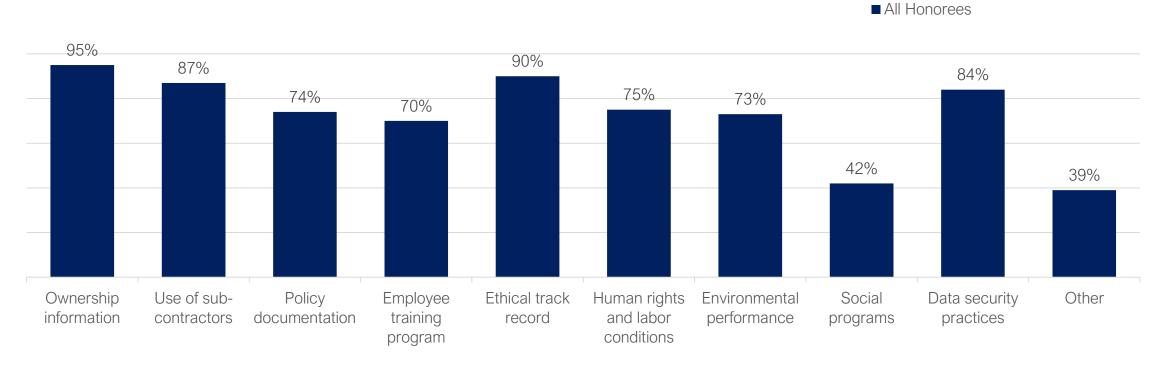
Review Third Party Diligence Processes

EQ 4F.15 When do you conduct compliance and ethics due diligence of third parties that pose a material compliance, ethics, and/or reputation risk? (Multiple select)



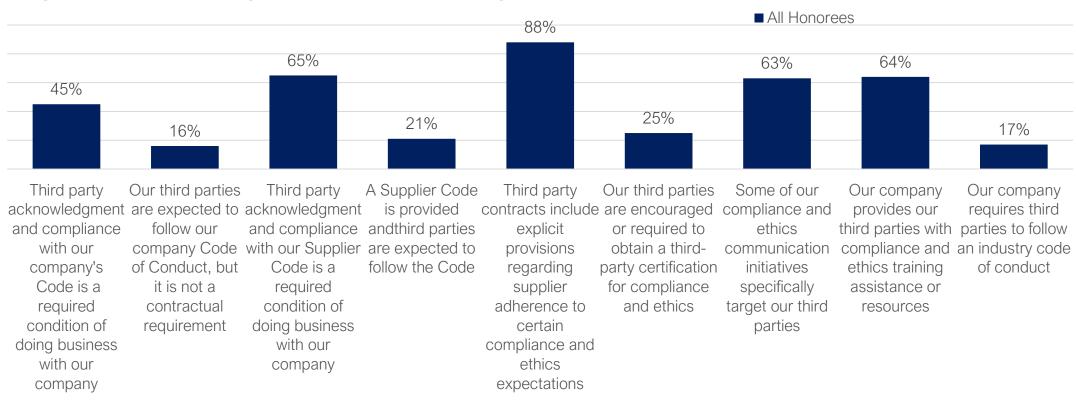
Review Third Party Diligence Processes

EQ 4F.16 What information, if any, do you consider in your compliance and ethics due diligence of third parties? (Multiple select)



Review Third Party Diligence Processes

EQ 4F.17 How does your company establish its compliance and ethics expectations and requirements for third parties that pose a material compliance, ethics, and/or reputation risk?



Review Third Party Diligence Processes

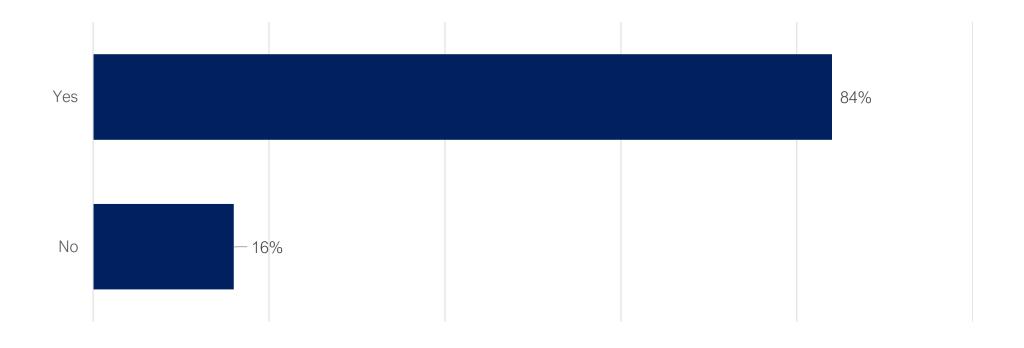
EQ 4F.18 Does your company maintain a procurement policy that addresses key aspects of third party selection, management, and compliance oversight?





Review Third Party Diligence Processes

EQ 4F.19 Does your company conduct periodic audits of third parties to ensure compliance with ethical and legal standards?



^{*}Other departments at Avangrid outside of Ethics and Compliance are conducting such periodic audits in high-risk areas.

Managing Exposure to Human Trafficking Risk

EQ 4D.9 Which of the following apply to how your company manages its exposure to human trafficking risk?

Unique efforts to prevent human trafficking

Procedure preventing all agents from engaging in trafficking in persons

Housing plan that meets the host-country housing and safety standards

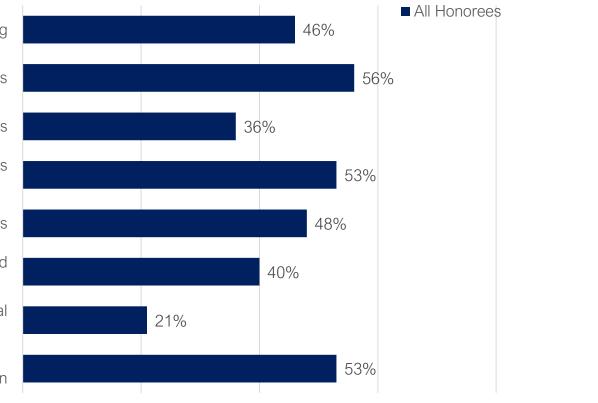
Recruiting policy that requires wages meet applicable host-country requirements or explains any variance

Recruiting policy that prohibits charging employees recruitment fees

Recruiting plan that permits only the use of recruiting companies with trained employees

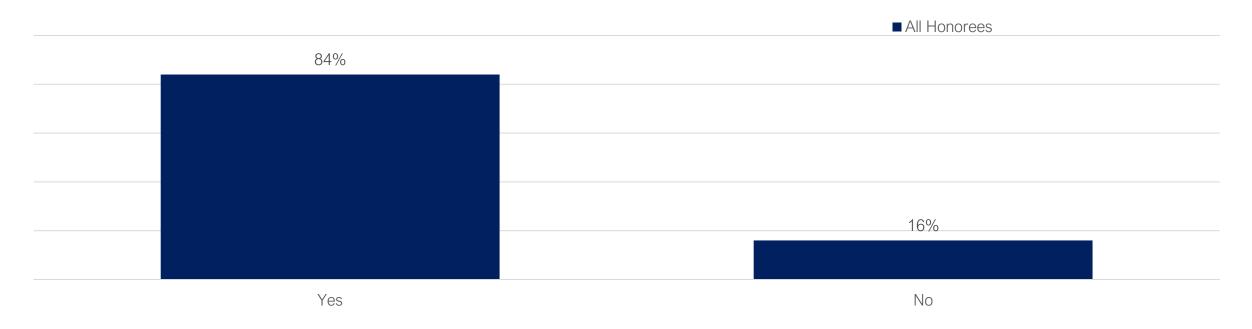
Our company informs employees of the hotline phone number of the Global Human Trafficking hotline

Promote a zero-tolerance policy prohibiting human trafficking and traffickingrelated activities and the consequences should employees violate this prohibition



Risk Assessment, Monitoring & Auditing Third Party Code of Conduct

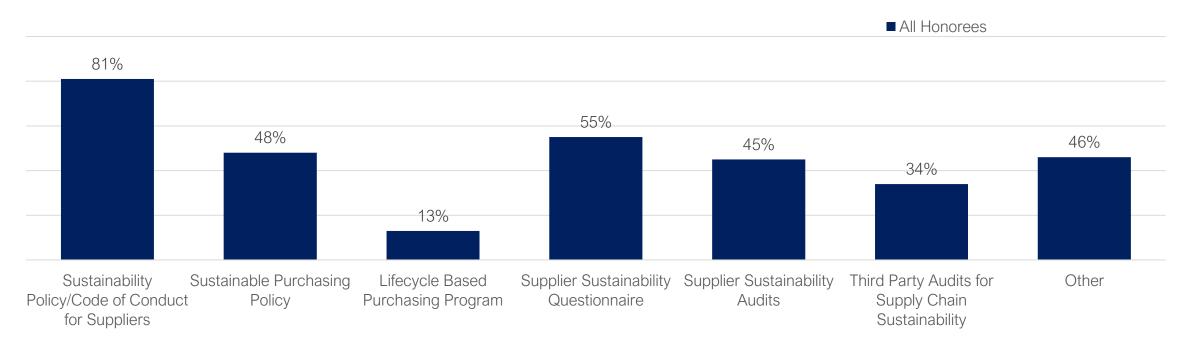
EQ 4C.10 Does your company maintain a third party (e.g., supplier, agent, intermediary, reseller) Code of Conduct?



Corporate Citizenship and Responsibility

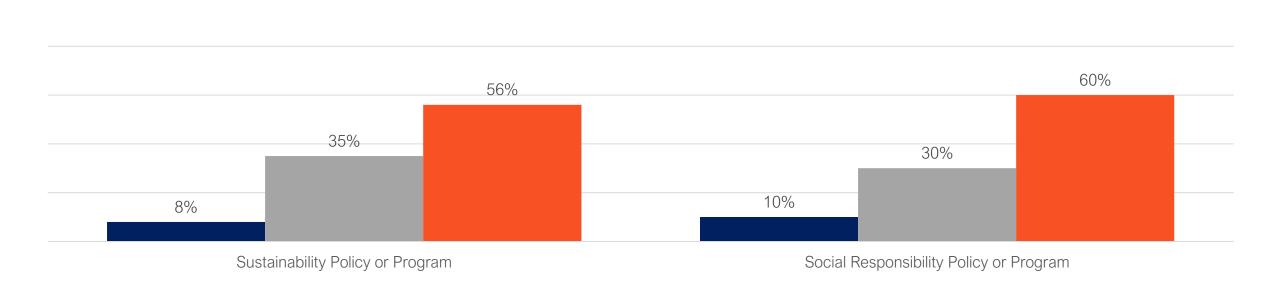
Ownership of Sustainability Efforts

5.18 What measures has your company taken in order to manage sustainability-related risks of your supply chain? (Multiple select)



Corporate Citizenship and Responsibility Third Party Expectations

EQ 5.19 Does your company require its third parties to have a formal sustainability or social responsibility policy or program?



- All third parties are required to have a formal policy on this topic
- Only certain third parties are required to have a formal policy on this topic
- Our company doesn't require suppliers to have a formal policy





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