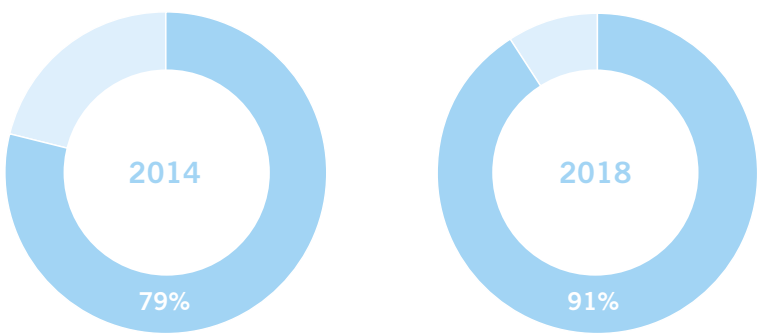


Whistleblowing/Reporting: Europe listed companies*

% of European listed companies which publicly reference a reporting or ‘speak up’ policy.



91% of companies publicly refer to having a reporting channel for concerns.
50% make their policies publicly available.

European companies’ reporting policies cover a range of issues including:

Personal abuses
Including discrimination, harassment, bullying, and blackmail.

Corruption
Anti-bribery, gifts & hospitality, theft, tax evasion, political contributions, and government contracts.

Information and communication
Data protection, disclosure of confidential information, responsible marketing, and social media activities.

Environment and sustainability
Compliance with environmental protection laws, sustainability, and responsible sourcing of materials.

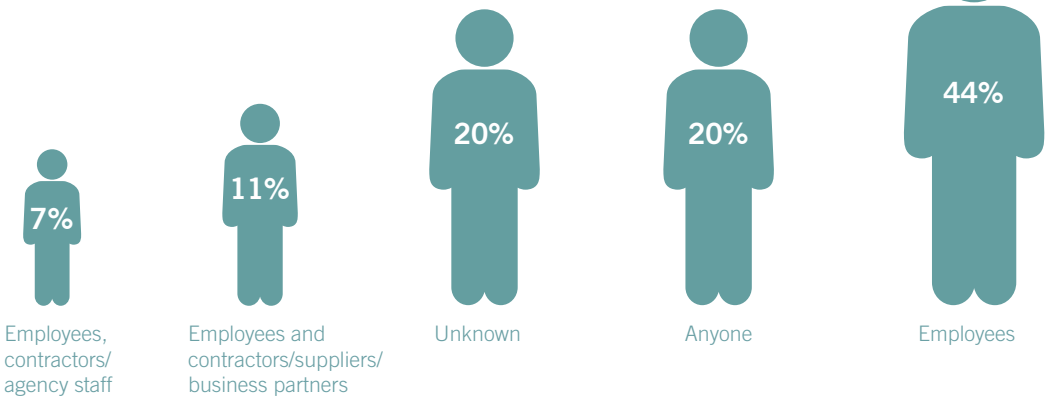
Trade
Compliance with trade law including export control, sanctions, and awareness of terrorist financing.

Market integrity
Insider dealing, price fixing, and compliance with competition regulation.

Financial malpractice
Fraud, accounting, false financial reporting.

Working malpractice
Health and safety, hiring standards, non-disclosure agreements, concealing breaches of policy, alcohol and drug use, inappropriate relationships.

Who can make a report?



% of companies specifying that a given category can report

Of companies with a reporting or speak up policy, 20% specify that anyone can make a report.

Channels for making a report?



% of companies specifying that a given category can report

Top European companies offer a number of ways to report with 48% of those with a policy promoting a dedicated phone line

26% of companies make an audit committee, compliance, ethics, or risk team responsible for their reporting services

Person or function responsible for overseeing reporting within top European companies with a policy



29% of top European companies with a reporting or speak up policy specify having independent reporting channels which are externally managed.

*Data source:

Index	Country	Count of Index
AEX	Netherlands	25
CAC40	France	40
DAX30	Germany	30
IBEX35	Spain	35
LuxX	Luxembourg	9
OMX Stockholm 30	Sweden	30
SMI	Switzerland	20
WIG30	Poland	30
Total		219

Poland not included in 2014 figures.