

# Use of the Global Reporting Initiative (GRI) in Sustainability Reporting by European Electricity Companies

Tim Steinweg & Joseph Wilde-Ramsing

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**Amsterdam, December 2012**

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## Colophon

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This research was undertaken independently by SOMO, and the conclusions do not represent the views or research conclusions of the Global Reporting Initiative. The foreword represents the views of EPSU.

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## Acronyms

<b>CBA</b>	<i>Collective bargaining agreement</i>
<b>CSR</b>	<i>Corporate social responsibility</i>
<b>EPSU</b>	<i>European Federation of Public Service Unions</i>
<b>EUSS</b>	<i>Electric Utilities Sector Supplement (of the GRI)</i>
<b>EWC</b>	<i>European works council</i>
<b>FTE</b>	<i>Full-time employee</i>
<b>GRI</b>	<i>Global Reporting Initiative</i>
<b>H&amp;S</b>	<i>Health and safety</i>
<b>SOMO</b>	<i>Centre for Research on Multinational Corporations</i>

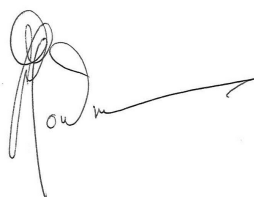
## Foreword by Jan Willem Goudriaan, EPSU

This is the first known study that takes a detailed look at the use of the Global Reporting Initiative (GRI) Framework, which has become a global standard for companies' reporting on non-financial aspects of their operations. When the European Federation of Public Service Unions (EPSU) commissioned the paper you are now reading, we were not prepared for the findings. We were primarily interested in how European electricity companies report on a limited number of GRI Indicators and its Electricity Utilities Sector Supplement (EUSS). We expected that these indicators would provide a picture of employment and other social trends such as retirement and coverage of collective bargaining in the sector. Differences in reporting could be used by European Works Council representatives and trade union representatives to challenge those companies whose reporting was substandard and to address the impact of demographic change on the sector, as well as improving health and safety, equality and training policies.

We were not prepared for the overwhelming number of discrepancies in company reporting and the GRI Application Level they use. Nearly two-thirds of the companies in this study claimed to provide information that they did not actually supply on at least one occasion. This undermines the credibility of the GRI. Companies want to use a high GRI Application Level, as this will make them more attractive for responsible investors. However, the systematic discrepancies found distort reality and disadvantage those companies that take their corporate social responsibility (CSR) and ethical behaviour seriously. Also striking (and disappointing) is the finding that systematic discrepancies were found even among those reports that had been externally checked by professional auditing companies and the GRI itself. The study also makes clear new investors in the electricity sector, including Chinese companies and private equity funds, have substandard reporting.

I was part of the EPSU negotiating team that sought to agree a common position with Eurelectric (European electricity employers) on CSR in the electricity sector in 2009. We promoted a voluntary approach and use of the GRI Guidelines and the EUSS. The results of this study indicate that this decision should be reviewed. We also expect the European Commission and European Parliament to take the findings into account when considering a proposal on disclosure of non-financial information by companies. Stricter rules and sanctions appear to be necessary. We will also work with members of the European Works Councils to improve reporting.

I thank Joseph Wilde-Ramsing and Tim Steinweg for the excellent work and stimulating discussions. Their efforts to ensure that reporting on corporate responsibility generally contributes to more sustainable business practices are remarkable.

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a long horizontal line that ends in a small arrowhead pointing to the right.

Jan Willem Goudriaan, Deputy General Secretary  
European Federation of Public Service Unions

# 1. Introduction

## 1.1. Context and point of departure

Companies are required by law to report on a wide range of aspects related to the financial performance of their operations. Reporting on non-financial aspects (such as social and environmental impacts) of corporate activity, on the other hand, is largely left to voluntary initiatives and 'soft law' guidelines and recommendations. Such voluntary and self-regulatory initiatives can add value to overall corporate reporting and disclosure. Voluntary initiatives can drive and highlight best practice and encourage innovative front-runners to continually strive to improve. They encourage leadership and innovation and can improve leaders' business credentials and therefore competitiveness. In order to do so, however, it is crucial that such voluntary initiatives should be codified and credible.

The sustainability reporting guidelines developed by the Global Reporting Initiative (GRI) are globally acknowledged to be an important voluntary tool that companies can use to facilitate and improve reporting on non-financial aspects of their operations. The joint statement on CSR by the European electricity sector social partners recognises this, and encourages European electricity companies to understand the GRI Guidelines and use them as a reference standard when developing CSR policies.<sup>1</sup>

The European Federation of Public Service Unions (EPSU), representing workers in a range of public services including in public and private energy companies, commissioned the Centre for Research on Multinational Corporations (SOMO) to conduct research on the use of the GRI Sustainability Reporting Framework, specifically the Electric Utilities Sector Supplement (EUSS) by European electricity companies. This report is the outcome of that research. It provides follow-up to a June 2010 SOMO report entitled "European Works Councils and Corporate Social Responsibility in the European Energy Sector".<sup>2</sup>

## 1.2. Aim

The primary aim of the project is to provide an overview of how European electricity companies report on sustainability aspects using the GRI Guidelines, specifically the EUSS as a benchmark. The overview highlights the differences in how the various companies report, the gaps where no (or few) companies report, and seeks to analyse why companies do or do not report on certain issues/indicators. Reporting on CSR and using the GRI and EUSS Guidelines was an important issue for the European social partners in the electricity industry in their 2009 joint statement on CSR.<sup>3</sup> This report can assist their evaluation.

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<sup>1</sup> EPSU, Eurelectric and EMCEF, 2009, *Joint Position on the Social Aspects of Corporate Social Responsibility in the European Electricity Industry*. EPSU, Eurelectric and EMCEF, Brussels, <<http://www.epsu.org/a/5343>> (16 October 2012).

<sup>2</sup> J. Wilde-Ramsing and T. Kerckhoffs, 2010, *European Works Councils and Corporate Social Responsibility in the European Energy Sector*. SOMO: Amsterdam, <[http://somo.nl/publications-en/Publication\\_3533](http://somo.nl/publications-en/Publication_3533)> (15 September 2012).

<sup>3</sup> European electricity industry social partners, 2009, <[http://www.epsu.org/IMG/pdf/Joint\\_Position\\_CSR\\_22\\_June\\_2009-2.pdf](http://www.epsu.org/IMG/pdf/Joint_Position_CSR_22_June_2009-2.pdf)> (15 September 2012).

### 1.3. Target groups

This report is primarily intended to assist European social partners in their understanding of the application of the GRI Framework as a voluntary reporting mechanism. The report also presents findings and conclusions that are relevant for a range of other target groups including the GRI, companies that make use of the GRI Framework: the European Parliament; the European Commission; individual European governments; professional auditing and assuring companies; national and international unions; European Works Councils; civil society organisations; investors; and benchmarking organisations.

On the basis of the conclusions of this research, recommendations for each of these target groups are included at the end of this report.

### 1.4. Scope and research questions

The scope of the present research comprises an investigation of the sustainability reporting of 19 European electric utility companies on 10 GRI and EUSS labour-related indicators. The companies (and their country of origin) included are the following:

1. ČEZ Group (ČEZ) (Czech Republic)
2. DELTA (Netherlands)
3. DONG Energy (DONG) (Denmark)
4. Électricité de France (EDF) (France)
5. Ente Nazionale per l'Energia eLettrica (Enel) (Italy)
6. Electricidade de Portugal (EDP)/Hidrocantábrico (Portugal)
7. E.ON (Germany)
8. Energie-Versorgung Niederösterreich (EVN) (Austria)
9. FORTUM (Finland)
10. Gas Natural Fenosa (Spain)
11. Gaz de France/Suez (GDF Suez) (France)
12. Iberdrola (Spain)
13. Rheinisch-Westfälisches Elektrizitätswerk (RWE) (Germany)
14. National Grid (UK)
15. Statkraft (Norway)
16. TenneT (Netherlands)
17. Vattenfall (Sweden)
18. Veolia Environnement (Veolia) (France)
19. Verbund (Austria)

Mid-way through the research trajectory, it was decided to include the Russian company Gazprom Neft in the study. As a result, the company is included in the overview of reporting per indicator (Chapter 2), but not in the further analysis per indicator (Chapter 3).

The 10 selected indicators are:

- EU14. Programs and processes to ensure the availability of a skilled workforce.
- EU15. Percentage of employees eligible to retire in the next 5 and 10 years broken down by job category and by region.
- EU16. Policies and requirements regarding health and safety of employees and employees of contractors and subcontractors.



- ❑ EU17. Days worked by contractor and subcontractor employees involved in construction, operation and maintenance activities.
- ❑ EU18. Percentage of contractor and subcontractor employees that have undergone relevant health and safety training.
- ❑ LA1. Total workforce by employment type, employment contract and region, broken down by gender.
- ❑ LA4. Percentage of employees covered by collective bargaining agreements.
- ❑ LA6. Percentage of total workforce represented in formal joint management–worker health and safety committees that help monitor and advise on occupational health and safety programmes.
- ❑ LA8. Education, training, counselling, prevention, and risk-control programmes in place to assist workforce members, their families or community members regarding serious diseases.
- ❑ LA10. Average hours of training per year per employee by gender, and by employee category.

### **G3 versus G3.1**

In early 2011, the GRI updated its Reporting Framework to version 3.1. One of the elements that was included in the updated version G3.1 was a further breakdown of reporting by gender.<sup>4</sup> Companies have a choice to either use G3 or G3.1. For most of the indicators included in this research, this update had no significant consequences. The only indicator relevant for this research that changed significantly was LA1 (Total workforce by employment type, employment contract and region, broken down by gender). This did not include the element of gender in the previous version G3, which was used for creating the EUSS. In Chapter 3, it is specified per company whether gender has been included in the reporting or not.

### **Research questions**

For each of the selected companies, the present report aims to answer the following research questions:

1. Does the company use the GRI Guidelines?
2. Does the company use the EUSS?
3. If the company uses the GRI Guidelines, what GRI Application level did it use for its 2011 report?
4. Has the 2011 report been externally verified and has the application level been checked?<sup>5</sup>
5. If the company uses the EUSS, how did it report on the 10 selected indicators?
6. What general gaps in reporting can be found and what are the reasons for such gaps?

## **1.5. Research methods**

The primary sources of information for this research are the selected companies' 2011 CSR/sustainability reports and associated or accompanying websites. For all the reports that have been written using the GRI Guidelines, the GRI content indexes of each report have been used to locate the relevant information for each of the indicators within the CSR/sustainability reports. The initial research into company reporting on the selected indicators focused on the information as indexed by the company itself in the GRI Index of its CSR/sustainability report. Additional information was gathered using the database of reports as published on the GRI website. This database provides basic information on reports, such as the GRI Application Level, whether it has been externally verified

<sup>4</sup> Meeting with GRI staff, 8 August 2012.

<sup>5</sup> This question was not part of the original project proposal, but has been identified as a relevant element in assessing the reporting of the companies.

and whether the GRI or a third party has checked the rating of the report. Additional information was collected directly from company representatives during the review procedure (see below). A full list of all of the sources of reporting information used for each of the selected companies can be found in Annex 1.

In Chapter 3, further analysis is conducted on each of the indicators. This analysis makes use of the GRI Content Index template and Checklist, which provides detailed guidance for companies on the requirements for each indicator.<sup>6</sup> Each indicator is broken down according to 'compilation points', specifying the information required to attain a full reporting level on this indicator. Companies are assessed according to whether they report on each of these compilation points. Further information to help interpret these compilation points and the reasoning for the inclusion was gathered from the GRI Indicator Protocols.<sup>7</sup>

As SOMO researchers began collecting data to answer the research questions, it quickly became evident that it was going to be very difficult, if not impossible, to conduct an adequate analysis of the content of reporting for each of the indicators (i.e. research questions #5 and #6) due to the large number of discrepancies between the degree to which a company *claims* that it reports on the various indicators in the GRI Content Index, and the actual degree of reporting on the indicators and compilation points. As a result, this research was only able to partially answer research questions #5 and #6, and the focus of the analysis of the report shifted toward identifying the frequency of discrepancies and the reasons they occur.

For each of the selected companies, a company 'partial profile' was created. Each partial profile included all of the information reported by the companies on each of the selected GRI Indicators. As part of SOMO's standard review procedure, all of the companies for which discrepancies were found received a draft of the findings (i.e. their draft 'partial profile'), along with a number of questions about the discrepancies that had been found. The companies were allowed two weeks to provide answers to the questions and corrections to the draft. Seven companies made use of the opportunity and provided input: Dong, Fortum, Iberdrola, RWE, Statkraft, Vattenfall and Verbund. Their comments were incorporated into the present report. Enel, EDP Hidrocantábrico, GDF Suez, TenneT, Veolia did not respond to multiple requests from SOMO to provide comments on a draft. Delta, EVN, and Gas Natural Fenosa initially indicated that they would comment on a draft, but later were unable to do so. EDF, E.ON and National Grid indicated their willingness to provide comments, but since no discrepancies were found in their reporting on the selected indicators, this was not necessary. In addition to the energy companies themselves, two companies (Statkraft and Fortum) sent the draft partial profile to their auditing/assuring firm, Deloitte, which also provided comments that have been incorporated into the present report. The 'partial profiles' themselves are too long to be included in the present report, but are available to the reader upon request.

Finally, SOMO presented the preliminary results of the research to members of European Works Councils (EWCs) of the selected companies at a meeting organised by EPSU on 26 September 2012.

## 1.6. Structure of the report

The structure of this report follows the research design. Chapter 2 gives an overview of the use of the GRI Guidelines for each of the companies included in this research, as well as the extent of their

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<sup>6</sup> GRI website, Content Index and Checklist, <<https://www.globalreporting.org/reporting/reporting-support/reporting-resources/content-index-and-checklist/Pages/default.aspx>> (18 November 2012).

<sup>7</sup> GRI website, Electric Utilities Sector Supplement, <<https://www.globalreporting.org/resourcelibrary/EUSS-Complete.pdf>> (18 November 2012).

reporting for each of the included indicators. Chapter 3 presents more detailed data for each of the indicators, and looks at whether companies that indicate full reporting on an indicator actually address each of the compilation points. Chapter 4 looks at the sustainability reporting of some of the shareholders and owners of European utility companies. Chapter 5 offers a summary and analysis of the major findings of this research, while Chapter 6 draws conclusions and formulates the recommendations for each of the target groups.

## 2. Overview of reporting on selected indicators

Table 1 presents an overview of the reporting by each of the companies on the GRI Indicators selected for analysis in the present study. The table contains information on the following:

- whether the company publishes a CSR/sustainability report;
- whether the company made use of the GRI Guidelines in their most recent CSR/sustainability report;
- whether the company made use of the EUSS;
- whether the report was externally assured;
- whether the application level has been checked;
- whether the CSR/sustainability report was integrated in the annual reporting; and
- the GRI Application Level of the report.

ČEZ Group is the only company that did not publish a CSR/sustainability report. Veolia did not make use of the GRI Guidelines in its 2010 or 2011 CSR reports (although it had done so in previous years), so no analysis was conducted on Veolia's reporting. DELTA published a 2010 CSR report using the GRI Guidelines, but has not yet published a 2011 report. The analysis of DELTA's reporting is thus based on its 2010 report.

All the other companies reported in accordance with the GRI Guidelines. Of this group, 12 out of 15 companies also made use of the EUSS, seven had their full report externally assured, and six had their Application Level checked by the GRI. Reports of six companies were on Application Level A+, indicating the most extensive use of the GRI Guidelines and that the report was externally assured.

**Table 1: General information on the reporting by electric utility companies**

Company	Published a CSR/ sustainability report	Use of GRI	Use of the EUSS	GRI version	Report externally assured	Application level checked	CSR/sustainability report in annual report	GRI Application Level of 2011 report
ČEZ Group	NO, only one chapter on the environment in its latest Annual report	No	No	N/A	No	No	No	N/A
DELTA	YES	YES	No	Unclear	No	No	No	C
DONG Energy	YES	YES	YES	G3	Entire sustainability report	Third-party-checked	NO	B+
E.ON	YES	YES	YES	G3	Limited/moderate	NO self-declared	NO, but CR section in the annual report	B+
EDF	YES	YES	NO	G3	Partially	NO	NO	N/A
EDP/ Hidrocantábrico	YES	YES	YES	G3.1	Limited/moderate	GRI-checked	YES	A+
Enel	YES	YES	YES	G3.1	YES	GRI-checked	NO	A+
EVN	YES	YES	YES	G3.1	YES	Third-party-checked	YES	A+
Fortum	YES	YES	YES	G3.1	Limited/moderate	Third-party-checked	YES	B+
Gas Natural Fenosa	YES	YES	YES	G3.1	Limited/moderate	GRI-checked	NO	A+
Gazprom Neft	YES	YES	NO	G3.1	NO	NO self declared	NO	B
GDF Suez	YES	YES	NO	Unclear	YES	GRI-checked	NO	B+
Iberdrola	YES	YES	YES	G3.1	YES	GRI-checked	NO	A+
National Grid	YES	YES	NO	G3	Only for environmental data	NO	NO	Not reported
RWE	YES	YES	YES	G3	Moderate	GRI-checked	NO	A+
Statkraft	YES, a CR statement	YES	YES	G3	YES	Third-party-checked	YES	B+
TenneT	YES	YES	YES	G3	NO	NO	NO	C
Vattenfall	YES	YES	YES	G3	Entire sustainability report	Third-party-checked	NO	B+
Veolia	YES	NO	NO	N/A	N/A	N/A	N/A	N/A
Verbund	YES	YES	YES	G3	Limited	Third-party-checked	NO	A+

Table 2 shows the level of reporting of the companies for each of the indicators. It should be noted that this information is reported by the companies themselves. As will be noted in Chapter 3, a number of discrepancies were found between the reported levels and the actual information provided in the CSR reports. An overview of these discrepancies is provided in Chapter 5. The only exceptions are EDF, National Grid, Statkraft and Vattenfall. These companies only reveal whether they report on an indicator, but do not reveal whether they report 'fully' or 'partially'. For these companies, the reported score below represents SOMO's evaluation.

None of the companies report fully on all the indicators included in this report. Enel and Iberdrola are the two best scorers, only reporting 'partially' on one of the indicators, while EVN reports 'partially' on two indicators. The indicator LA6, regarding health and safety committees is the one that least companies report on – as eight reporting companies (including Gazprom Neft) do not address this indicator. Indicator LA10, dealing with training hours, is the indicator for which the companies differ the most – as six companies report fully, eight report partially and three do not address the indicator. EU16, EU17 and LA8 are indicators for which most of the companies (eight, eight and ten respectively) indicate that they report fully.

**Table 2: Extent of reporting by company and by indicator**

Company	EU14	EU15	EU16	EU17	EU18	LA1	LA4	LA6	LA8	LA10
ČEZ Group	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
DELTA*	n/a	n/a	n/a	n/a	n/a	Partial**	None	None	Partial**	Partial**
DONG Energy	Partial	Full	Full	None	Full	Full	Full	None	Full	None
EDF*	n/a	n/a	n/a	n/a	n/a	Partial**	Full**	None	None	Partial**
EDP/Hidrocantábrico	Full	Full	Full	Full	Partial	Partial	Partial	Full	Full	Full
Enel	Full	Full	Full	Full	Full	Full	Partial	Full	Full	Full
E.ON	Partial	Partial	Partial	None	Partial	Partial	Partial	Partial	Partial	Partial
EVN	Full	Full	Partial	Full	Partial	Full	Full	Full	Full	Full
Fortum	None	None	Full	Full	Partial	Full	Partial	Full	Partial	None
Gas Natural Fenosa	Full	Full	Full	Partial	Full	Full	Full	Full	Full	Partial
Gazprom Neft	n/a	n/a	n/a	n/a	n/a	Partial	None	None	Partial	Partial
GDF Suez	n/a	n/a	n/a	n/a	n/a	Full	Partial	Partial	Full	Full
Iberdrola	Full	Full	Full	Full	Full	Partial	Full	Full	Full	Full
National Grid*	n/a	n/a	n/a	n/a	n/a	Partial**	Partial**	None	None	Partial**
RWE	Full	Full	Full	Partial	Full	Partial	Partial	None	Full	Partial
Statkraft*	Partial**	None	Partial**	None	Partial**	Partial**	Partial**	None	None	None
TenneT	None	None	None	None	None	Full	Full	None	Partial	Partial
Vattenfall*	Partial**	Partial**	Partial**	Partial**	Partial**	Partial**	Full**	Full**	Full**	Partial**
Veolia	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Verbund	Full	Full	Full	None	Full	Partial	Full	Full	Full	Full

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

### 3. Reporting per indicator

This chapter looks at each of the EUSS indicators in more detail. First the compilation points are listed, which provide the building blocks on how a company should report for that indicator. As confirmed by GRI staff, each of these points would have to be addressed to merit a 'full' reporting score on that indicator, unless the company explicitly indicates that it has a 'valid reason for omission' for a particular compilation point or points.

#### EU 14 - Programs and processes to ensure the availability of a skilled workforce

The EU14 indicator is broken down into the following compilation points:

- Programs to assess skills needed in the workforce
- Training programs including apprenticeship programs for new workers and specialized training on existing and new technologies for existing workers.
- On-going higher education for qualified technical workers, for example electrical and mechanical engineers.
- Training partnerships between utility and technical institutions to develop capacity.
- The development of local employees when a utility is operating outside its national borders.
- Programs to source workers from beyond national boundaries and country of origin recruitment policies and consideration of impact to the home country.
- Programs to attract and retain employees and include a reference to diversity including gender and race.

Table 3 provides an overview of the companies' reporting on the EU 14 indicator and its component compilation points. Of the 13 companies that claim to use the EUSS in their reporting:

- seven claim that they report "fully" on the EU14 indicator
- two (Dong Energy and E.ON) claim that they report "partially" on the indicator
- two (Fortum and TenneT) note that they do not report on the indicator.

Two companies (Statkraft and Vattenfall) do not indicate whether they report 'fully' or 'partially', but are assessed to provide only partial information on this indicator.

It is interesting to note that not a single one of seven companies that claim to report fully on the indicator actually reports on all of the compilation points of this GRI Indicator. In fact, most of the companies address less than half of the compilation points. RWE is the company that reports most fully on this indicator, addressing six of the seven compilation points.

The companies seem to have particular difficulty reporting on policies and programmes for ensuring a skilled workforce outside their home country. For example, none of the companies in the present study reports anything on the compilation point related to sourcing workers from beyond national boundaries and the impact on workers' home countries. Similarly, only four of the companies (RWE, EVN, Gas Natural Fenosa and Iberdrola) report on the compilation point related to developing the skills of local employees when operating beyond national borders.



Verbund does indicate that this compilation point is not relevant for the company since “nearly 100%” of its workforce is located within Austria,<sup>8</sup> but the majority of companies simply do not mention the issue at all.

Another major point of discrepancy relates to reporting on programmes to attract and retain employees, including a reference to diversity including gender and race. Although many companies do report on a programme to attract and retain employees, only one company (Verbund) references gender diversity. None make mention of diversity of race.

Another compilation point on which less than half of the EUSS companies report is programmes to assess skills needed in the workforce. Only five companies (RWE, EDP/Hidrocarbónico, Enel, Iberdrola and Vattenfall) report on this issue. Among the companies that claim to report fully on the EU14 indicator, the following discrepancies in reporting have been identified:

- ❑ EDP/Hidrocarbónico does not address the two compilation points related to workers outside national borders.
- ❑ Enel claims that it reports fully on the indicator but in fact does not address any of the compilation points completely. The company reports partially on three compilation points and not at all on four of the points.
- ❑ EVN claims that it reports fully on the indicator but in fact only addresses one of the compilation points completely.
- ❑ Gas Natural Fenosa claims that it reports fully on the indicator, but does not address the two compilation points related to workers outside national borders or the point on assessing skills needed in the workforce.
- ❑ Iberdrola claims that it reports fully on the indicator, but does not address the compilation point related to impact on workers’ home country nor the point related to attracting and retaining a diversity of employees. Iberdrola provided SOMO with a response to this finding, in which they explain that the impact on workers’ home country is indirectly addressed through the company’s mentioning of the programmes it offers, which have been attended by managers and employees from the different regions where the company is active. Therefore, the programmes to ensure a skilled workforce have an impact on the workers’ home countries. Iberdrola also states that its position on attracting and retaining a diverse workforce is made clear throughout the entire report, rather than specifically mentioned for this indicator.
- ❑ RWE addresses six of the seven compilation points. The company does not address the compilation points on programmes to source workers from beyond national boundaries.
- ❑ Verbund claims that it reports fully on the indicator but in fact only addresses two of the compilation points completely (as well as one partially, indicating that one is not relevant for its operations). In response to SOMO questions regarding this discrepancy, Verbund points to the sections of its CSR report that refer to apprentice trainings, training programmes for skilled workers, its trainee programme, its programmes with gifted technical students and its promotion of the position of women in its workforce.<sup>9</sup> The company also explains that its handful of employees abroad are not included in the report as they are employed by subsidiaries that are not fully consolidated. A number of other elements from the compilation points, such as the programmes to assess needed skills or the reference to race diversity, are not addressed.

<sup>8</sup> Verbund, “GRI Index 2011”, <<http://www.verbund.com/cc/en/responsibility/key-figures-and-reports/sustainability-reports>> (28 August 2012).

<sup>9</sup> Verbund, responses to SOMO questions, email received 4 October 2012.

**Table 3: Companies' reporting on the EU14 compilation points**

Company	How does the company claim to report on this indicator?	Program to assess skills needed in the workforce.	Training programs including apprenticeship programs for new workers and specialized training on existing and new technologies for existing workers.	On-going higher education for qualified technical workers, for example, electrical and mechanical engineers	Training partnerships between utility and technical institutions to develop capacity	The development of local employees when a utility is operating outside its national borders	Programs to source workers from beyond national boundaries and country of origin recruitment policies and consideration of impact to the home country	Programs to attract and retain employees and include a reference to diversity including gender and race
ČEZ Group	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
DELTA	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
DONG Energy	Partially	No	Partial, only reference to existing workers	Yes	No	No	No	No
EDF	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EDP/ Hidrocantábrico	Fully	Yes	Yes	Implicit	Yes	No	No	Yes, but no reference to diversity
Enel	Fully	Yes, but not specifically on needed skills	Partial, only reference to existing workers	No	No	No	No	Yes, reference to incentive system but no mention of diversity
E.ON	Partially	No	Yes	No	No	No	No	No
EVN	Fully	No	Yes, reference to apprenticeship and trainings of existing workers, but only regarding leadership and not technical	No	Yes	Yes, but only on leadership	No	No
Fortum	None	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Gas Natural Fenosa	Fully	No	Yes, but only reference to programmes for existing workers	Yes	Yes	Yes	No	No
GDF Suez	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Iberdrola	Fully	Yes	Yes, but only reference to existing workers	Yes	Yes	Yes	No	No
National Grid	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

RWE	Fully	Yes	Yes, but only refers to apprenticeships	Yes, but specific mention of young professionals	Yes	Yes	No	Yes
Statkraft*	Partially**	No	Yes	No	No	No	No	Yes, but no mention of diversity
TenneT	None	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Vattenfall*	Partially**	Yes	Yes, but only reference to existing employees	No	No	No	No	Yes, but no mention of diversity
Veolia	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Verbund	Fully	No	Yes	Yes	No	No, though not very relevant because nearly 100% of workforce is in Austria	No	Partial, reference to gender but not to race

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## EU 15 - Employees eligible to retire in the next 5 & 10 years

The EU15 indicator relates to the percentage of employees eligible to retire in the next 5 and 10 years broken down by job category and by region. The indicator is broken down into the following compilation points:

- ❑ The actual or estimated percentage of employees eligible to retire over the next 5 year period broken down by category and region.
- ❑ The actual or estimated percentage of employees eligible to retire over the next 10 year period broken down by category and region.

Table 4 provides an overview of the companies' reporting on the EU 15 indicator and its component compilation points. Of the 13 companies that claim to follow the EUSS in their reporting, eight claim that they report "fully" on the EU15 indicator, one (E.ON) claims that it reports "partially" on the indicator, and three (Fortum, Statkraft and TenneT) note that they do not report on the indicator. Vattenfall does not indicate the extent of their reporting on this indicator, but are deemed to provide only partial information.

A detailed look at the companies' reporting on the individual compilation points reveals that only three of the companies (Enel, Gas Natural Fenosa and Iberdrola) report in a complete manner on both of the points.

Among the companies that claim to report fully on the EU15 indicator, the following discrepancies in reporting have been identified.

- ❑ DONG Energy does not address either of the compilation points. In a response from Dong Energy about this particular indicator, the company indicates that there is no fixed retirement age in Denmark, and that it therefore used the age category of 56+. This allows for comparisons over the years. The company also indicates that it has answered this indicator from a materiality perspective, only reporting on Denmark where 90% of the workforce is active.<sup>10</sup>
- ❑ EDP/Hidrocantábrico only reports on the compilation points by category, not by region.
- ❑ EVN does not break down the compilation points either by category or region.
- ❑ RWE does provide the percentages of the age distribution of its workforce, but does not break these figures down by job category or region.
- ❑ Verbund provides information on both compilation points, but does not break it down according to job category. In response to SOMO questions, the company does indicate that it is not material to break these figures down by region, as its main activities take place in Austria and Germany.<sup>11</sup>

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<sup>10</sup> Dong Energy, responses to SOMO questions, email received 28 September 2012.

<sup>11</sup> Verbund, responses to SOMO questions, email received 4 October 2012.

**Table 4: Companies' reporting on the EU15 compilation points**

Company	How does the company claim to report on this indicator?	The actual or estimated percentage of employees eligible to retire over the next 5 year period broken down by category and region	The actual or estimated percentage of employees eligible to retire over the next 10 year period broken down by category and region
ČEZ Group	n/a	n/a	n/a
DELTA	n/a	n/a	n/a
DONG Energy	Fully	No	No
EDF	n/a	n/a	n/a
EDP/ Hidrocarbónico	Fully	Partially, only broken down by category	Partially, only broken down by category
Enel	Fully	Yes	Yes
E.ON	Partially	No	No
EVN	Fully	Yes, but not broken down	Yes, but not broken down
Fortum	None	No	No
Gas Natural Fenosa	Fully	Yes	Yes
GDF Suez	n/a	n/a	n/a
Iberdrola	Fully	Yes	Yes
National Grid	n/a	n/a	n/a
RWE	Fully	No	No, only an imprecise indication ("around half of the employees") and not broken down
Statkraft*	None	No	No
TenneT	None	No	No
Vattenfall*	Partially**	Yes, but not broken down	Yes, but not broken down
Veolia	n/a	n/a	n/a
Verbund	Fully	Yes, but not broken down by category	Yes, but not broken down by category

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## EU 16 - Health and safety of employees and employees of contractors

The EU16 indicator relates to policies and requirements regarding health and safety of employees and employees of contractors and subcontractors. The indicator is specified by the following compilation point:

- Policies and requirements, including monitoring and compliance systems in place related to health and safety training of employees and employees of contractors and subcontractors.

Table 5 provides an overview of the companies' reporting on the EU 16 indicator and its single component compilation point. Of the 13 companies that claim to follow the EUSS in their reporting, eight claim that they report "fully" on the EU16 indicator, two (E.ON and EVN) claim that they report "partially" on the indicator, and one (TenneT) notes that it does not report on the indicator. Statkraft and Vattenfall do not indicate the extent of their reporting, but are deemed to provide only partial information.

**Table 5: Companies' reporting on the EU16 compilation points**

Company	How does the company claim to report on this indicator?	Policies and requirements, including monitoring and compliance systems in place related to health and safety training of employees and employees of contractors and subcontractors
ČEZ Group	n/a	n/a
DELTA	n/a	n/a
DONG Energy	Fully	Yes, marginal information
EDF	n/a	n/a
EDP/Hidrocantábrico	Fully	Yes
Enel	Fully	Yes, related to sanctions and tender requirements for subcontractors
E.ON	Partially	Yes, marginal information
EVN	Partially	Yes, works with only selected partners that are properly trained and regulation compliance is monitored
Fortum	Fully	Yes, realisation of safety targets are monitored
Gas Natural Fenosa	Fully	Yes
GDF Suez	n/a	n/a
Iberdrola	Fully	Yes
National Grid	n/a	n/a
RWE	Fully	Yes
Statkraft*	Partially**	No
TenneT	None	No
Vattenfall*	Partially**	No
Veolia	n/a	n/a
Verbund	Fully	Yes

\* Company does not indicate the extent of its reporting on this indicator, only indicates that it **does** report on the indicator.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## EU 17 - Days worked by contractor and subcontractor employees

The EU17 indicator relates to days worked by contractor and subcontractor employees involved in construction, operation and maintenance activities. The indicator is broken down into the following compilation points:

- Report days worked by contractor and subcontractor employees.
- An estimate, based on the contract terms or actual time worked, full time equivalent (FTE) days worked by contractor and subcontractor employees on electric utility systems broken down by construction.
- An estimate, based on the contract terms or actual time worked, FTE days worked by (sub)contractor employees on electric utility systems broken down by operation activities.
- An estimate, based on the contract terms or actual time worked, FTE days worked by contractor and subcontractor employees on electric utility systems broken down by maintenance activities.

Table 6 provides an overview of the companies' reporting on the EU17 indicator and its single component compilation point. Of the 13 companies that claim to follow the EUSS in their reporting, five claim that they report "fully" on the EU17 indicator, two (Gas Natural Fenosa and RWE) claim

that they report “partially” on the indicator, and an alarming five (DONG, E.ON, Statkraft, TenneT and Verbund) note that they do not report on the indicator.

A detailed look at the companies’ reporting on the individual compilation points reveals that Enel is the only company that reports in a complete manner on all four of the points. None of the companies except Enel provides an estimation of the FTE days worked by (sub)contractor employees on electric utility systems broken down by construction, operation activities or maintenance activities (i.e. the latter three compilation points). Among the companies that claim to report fully on the EU17 indicator, the following discrepancies in reporting have been identified:

- EDP/Hidrocontábrico only reports on the days worked by the employees of (sub)contractors. It does not provide a breakdown of those involved in construction, operation and maintenance activities.
- EVN does not address any of the compilation points (though it does “report” that it does not report on the issues in the points).
- Fortum only reports on the days worked by the employees of (sub)contractors. It does not provide a breakdown of those involved in construction, operation and maintenance activities. In response to SOMO’s questions regarding this discrepancy, the company indicates that it has followed the EUSS to the extent possible and that it believes that the compilation points are for reference only and are not mandatory.<sup>12</sup> This is further discussed in the analysis chapter of this report.
- Iberdrola does not address any of the compilation points (though it does “report” that it does not report on the issues in the points). Iberdrola provided a response regarding this particular indicator. The company states that it believes it reports fully by indicating that it does not consider it necessary to collect formal statistics on this. At the same time, the company recognises that it could have been an alternative to state that the indicator is not a material/relevant aspect for Iberdrola, rather than indicate “full” reporting.<sup>13</sup>

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<sup>12</sup> Fortum, responses to SOMO questions, email received 30 September 2012.

<sup>13</sup> Iberdrola, responses to SOMO questions, email received 28 September 2012.

**Table 6: Companies' reporting on the EU17 compilation points**

Company	How does the company claim to report on this indicator?	Report days worked by contractor and subcontractor employees	FTE days worked by contractor and subcontractor employees on electric utility systems broken down by construction	FTE days worked by contractor and subcontractor employees on electric utility systems broken down by operation activities	FTE days worked by contractor and subcontractor employees on electric utility systems broken down by maintenance activities
ČEZ Group	n/a	n/a	n/a	n/a	n/a
DELTA	n/a	n/a	n/a	n/a	n/a
DONG Energy	None	No	No	No	No
EDF	n/a	n/a	n/a	n/a	n/a
EDP/ Hidrocentrals	Fully	Yes	No	No	No
Enel	Fully	Yes	Yes	Yes	Yes
E.ON	None	No	No	No	No
EVN	Fully	No, but indicates it does not report	No	No	No
Fortum	Fully	Yes	No	No	No
Gas Natural Fenosa	Partially	Partial	No	No	No
GDF Suez	n/a	n/a	n/a	n/a	n/a
Iberdrola	Fully	No, but indicates it does not report	No	No	No
National Grid	n/a	n/a	n/a	n/a	n/a
RWE	Partially	No	No, but indicates contractors are used	No, but indicates contractors are used	No, but indicates contractors are used
Statkraft*	None	No	No	No	No
TenneT	None	No	No	No	No
Vattenfall*	Partially**	No	No	No	No, but indicates contractors are used
Veolia	n/a	n/a	n/a	n/a	n/a
Verbund	None	No	No	No	No

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## EU 18 - Contractor employees undergoing health and safety training

The EU18 indicator relates to the percentage of contractor and subcontractor employees that have undergone relevant health and safety training. The indicator is broken down into the following compilation points:

- Total number of contractor and subcontractor employees by category that have undergone health and safety training.
- Percentage of the total number of contractor employees and subcontractor employees in each category.



Table 7 provides an overview of the companies' reporting on the EU18 indicator and its single component compilation point. Of the 13 companies that claim to follow the EUSS in their reporting, six claim that they report "fully" on the EU18 indicator, six claim that they report "partially" on the indicator, and one (TenneT) notes that it does not report on the indicator.

A detailed look at the companies' reporting on the individual compilation points reveals that DONG is the only company that reports in a complete manner on both of the points. Only three of the companies (DONG, EDP/Hidrocarbónico and RWE) report by category on the total number of contractor and subcontractor employees that have undergone health and safety training (compilation point 1).

Among the companies that claim to report fully on the EU18 indicator, the following discrepancies in reporting have been identified.

- ❑ Enel does not report by category on the total number of contractor and subcontractor employees that have undergone health and safety training.
- ❑ Gas Natural Fenosa does not report on either of the compilation points, but it does note that subcontractors are obliged to provide training to their employees.
- ❑ Iberdrola does not report on either of the compilation points, but it does note that subcontractors are obliged to provide training to their employees. In a response to this particular discrepancy, Iberdrola states that it provides information about contractor and subcontractor training and that 100% of these workers have received training. Therefore, the company believes that it fully reports on this indicator.<sup>14</sup> However, Iberdrola does not address the compilation point of the total number of contractor and subcontractor employees that have received health and safety training either in its CSR report, or in the response to SOMO.
- ❑ Verbund does not report directly by category on the total number of contractor and subcontractor employees that have undergone health and safety training. The company does report that 100% of (sub)contractors undergo training, and in another area of the report the company provides the total number of contractor employees. The required information can thus be pieced together, but it is not provided integrally in the Content Index.

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<sup>14</sup> Iberdrola, responses to SOMO questions, email received 28 September 2012.

**Table 7: Companies' reporting on the EU18 compilation points**

Company	How does the company claim to report on this indicator?	Total number of contractor and subcontractor employees by category that have undergone health and safety training	Percentage of the total number of contractor employees and subcontractor employees in each category
ČEZ Group	n/a	n/a	n/a
DELTA	n/a	n/a	n/a
DONG Energy	Fully	Yes	Yes
EDF	n/a	n/a	n/a
EDP/Hidroantábriico	Partially	Yes	No
Enel	Fully	No	Yes
E.ON	Partially	No	No, but states it is a binding requirement
EVN	Partially	No	No, but states the subcontractors are obliged to provide the training
Fortum	Partially	No	No
Gas Natural Fenosa	Fully	No	No, but states the subcontractors are obliged to provide the training
GDF Suez	n/a	n/a	n/a
Iberdrola	Fully	No	No, but states the subcontractors are obliged to provide the training
National Grid	n/a	n/a	n/a
RWE	Fully	Yes	Yes
Statkraft*	Partially**	No	Yes
TenneT	None	No	No
Vattenfall*	Partially**	No	No
Veolia	n/a	n/a	n/a
Verbund	Fully	No	Yes

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## LA1 - Total workforce by employment type, employment contract, and region

The LA1 indicator relates to total workforce by employment type, employment contract, and region (broken down by gender). LA1 is the only indicator included in this research for which the G3.1 version is different from the G3 version. In the G3.1 version, several of the compilation points listed below also require a breakdown by gender. Table 8 includes an additional column that indicates whether the provided data are broken down by gender for those companies that report in accordance with G3.1.

The LA1 indicator is broken down into the following compilation points:<sup>15</sup>

- ❑ The total workforce broken down by employees and supervised workers (and gender for G3.1).
- ❑ The total number of employees broken down by type of employment contract (and gender for G3.1).
- ❑ The total number of permanent employees broken down by employment type (and gender for G3.1).
- ❑ The total workforce broken down by region (and gender for G3.1) using a geographic breakdown based on the scale of the organisation's operations.
- ❑ EUSS COMMENTARY: Total contractor workforce by employment type.
- ❑ EUSS COMMENTARY: Total contractor workforce by employment contract.
- ❑ EUSS COMMENTARY: Total contractor workforce by regulatory regime.

A noticeable trend for this indicator is that none of the companies included in this research reported on the contractor workforce, for which additional EUSS compilation points have been formulated. In response to SOMO questions on this finding, Dong Energy reported that it does yet not have systems in place to report on contractor statistics as required for this indicator. It does report on contractor injury statistics and on the contractor-related information for EU17, but indicates that it does not yet have the systems in place to detail the contractor data by employment type, contract or regulatory regime. The company also indicates that it is working on improving the quality of this data.<sup>16</sup> Fortum indicates that it believes that the compilation points are for reference only and are not mandatory.<sup>17</sup> This is further discussed in the analysis chapter of this report.

Thirteen of the companies in this research indicate that they make use of the EUSS. Of these thirteen, seven companies indicate that they report fully on this indicator, even while they do not address these compilation points. Fortum is the only company that addresses the contractor workforce, but it only reports on the total number of days worked by contractors, without addressing the absolute workforce, the employment types, contracts or regulatory regimes.

In addition, the following discrepancies are identified with companies indicating they report fully but do not actually address all of the compilation points:

- ❑ Dong Energy: does not break down its workforce by employees and supervised workers. In response to this particular discrepancy, the company indicates that the category of 'supervised workers' is not used in Denmark and that the term is not further defined in the GRI Indicator.<sup>18</sup>
- ❑ Enel: does not break down its workforce by employees and supervised workers.
- ❑ EVN: Does not break down the total number of employees by employment contract.
- ❑ Fortum: reports using the G3.1 framework but does not break down its figures by gender. In response to SOMO questions regarding this discrepancy, Fortum indicates that its report has been verified by an external assurance company, whose stand has been that the reporting for this indicator was sufficient. The company breaks down figures for gender at the group and managerial levels, and indicates that divisional and country level data is also available and was subject to verification by the assurance company.<sup>19</sup> Furthermore, the

<sup>15</sup> This indicator includes two compilation points that only need to be included when relevant. One of these deals with work performed by self-employed workers or individuals other than employees or supervised workers, while the other deals with seasonal variations in employment numbers. None of the companies in this research report on these compilation points and they have therefore not been included in this overview.

<sup>16</sup> Dong Energy, responses to SOMO questions, email received 28 September 2012.

<sup>17</sup> Fortum, responses to SOMO questions, email received 30 September 2012.

<sup>18</sup> Dong Energy, responses to SOMO questions, email received 28 September 2012.

<sup>19</sup> Fortum, responses to SOMO questions, email received 30 September 2012..

company believes that the compilation points are for reference only and are not mandatory. This is further discussed in the analysis chapter of this report.

- Gas Natural Fenosa: does not break down its workforce by employees and supervised workers and does not break down the total number of permanent employees by employment type.
- GDF Suez: does not break down its workforce by employees and supervised workers and does not break down the total number of permanent employees by employment type.
- TenneT: does not break down its workforce by employees and supervised workers and does not break down the total number of employees by employment contract. It also does not break down the total number of permanent employees by employment type, but does complement the absolute figures for the number of employees with the total FTE equivalents.

**Table 8: Companies' reporting on the LA1 compilation points**

Company	How does the company claim to report on this indicator?	Breakdown of compilation points by gender (for G3.1)	The total workforce broken down by employees and supervised workers	The total number of employees broken down by type of employment contract	The total number of permanent employees broken down by employment type	The total workforce broken down by region using a geographic breakdown based on the scale of the organisation's operations	EUSS COMMENTARY: Total contractor workforce by employment type	EUSS COMMENTARY: Total contractor workforce by employment contract	EUSS COMMENTARY: Total contractor workforce by regulatory regime
ČEZ Group	N/A	N/A							
DELTA*	Partial**	N/A	Partial (total workforce but not broken down)	No	No	No	No	No	No
DONG Energy	Full	N/A	No	Yes	Yes	Yes	No	No	No
EDF*	Partial**	N/A	No	No	Yes	No	No	No	No
EDP/Hidrocentro	Partial	N/A	No	Yes	Yes	Yes	No	No	No
Enel	Full	Yes	No	Yes	Yes	Yes	No	No	No
E.ON	Partial	No	No	Yes	Yes	Yes	No	No	No
EVN	Full	Yes	Yes	No	Yes	Yes	No	No	No
Fortum	Full	No	Yes	Yes	Yes	Yes	Gives total days worked	No	No
Gas Natural Fenosa	Full	Yes	No	Yes	No	Yes	No	No	No
GDF Suez	Full	Yes	No	Yes	No	Yes	No	No	No
Iberdrola	Partial	No	Unclear	Yes	Yes	Yes	No	No	No
National Grid*	Partial**	N/A	No	No	No	No	No	No	No
RWE	Partial	N/A	Unclear	Yes	Yes	Yes	No	No	No
Statkraft*	Partial**	N/A	No	No	Yes	Yes	No	No	No
TenneT	Full	N/A	No	No	No, but complements total number of employees with FTE equivalents	Yes	No	No	No
Vattenfall*	Partial**	N/A	No	No	No	Yes	No	No	No
Veolia	N/A	N/A							
Verbund	Partial	N/A	Yes, though the only division is 'employees' and 'trainees'	Yes	Yes	n/a (only Austria)	No	No	No

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## LA4 - Percentage of employees covered by collective bargaining agreements

The LA4 indicator is broken down into the following compilation points:

- The percentage of total employees covered by collective bargaining agreements.
- EUSS COMMENTARY: Percentage of contractor employees working for the reporting organisation covered by collective bargaining agreements by country or regulatory regime.

Similar to the LA1 indicator, none of the companies provide the information on contractor employees, as is required through the EUSS specific compilation point. In response to SOMO questions on this finding, Dong Energy indicates that it does not yet have the systems in place to report on such data.<sup>20</sup> Verbund also indicates that this data has not been collected and that it does not see this as an issue that is relevant for the company, given that approximately 90% of its subcontractors are Austrian and therefore are automatically covered by collective bargaining agreements.<sup>21</sup>

Nonetheless, of the 13 companies that make use of the EUSS, six companies (Dong Energy, EVN, Gas Natural Fenosa, Iberdrola, TenneT and Verbund) still indicate that they report fully on this indicator.

Three companies (Enel, Iberdrola and Vattenfall) specifically mention that the requested information about the contractor employees covered by collective bargaining agreements (CBAs) is not known, or that such data is not collected. Enel indicates that it aims to report such data by 2014. Enel is also the only one of these three companies that indicates it reports partially on this indicator, while Iberdrola assigns itself a full reporting score. Vattenfall does not indicate whether it reports fully or partially.

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<sup>20</sup> Dong Energy, e-mail to SOMO, 28 September 2012.

<sup>21</sup> Verbund, e-mail to SOMO, 4 October 2012.

**Table 9: Companies' reporting on the LA4 compilation points**

Company	How does the company claim to report on this indicator?	The percentage of total employees covered by collective bargaining agreements	EUSS COMMENTARY: Percentage of contractor employees working for the reporting organisation covered by collective bargaining agreements by country or regulatory regime
ČEZ Group	No	N/A	N/A
DELTA*	No	N/A	N/A
DONG Energy	Full	Yes	No
EDF (Electricité de France)*	Full**	Yes	No
EDP/Hidrocantábrico	Partial	Yes	No
Enel	Partial	Yes	Yes, indicates it is not known
E.ON	Partial	Yes	No
EVN	Full	Yes	No
Fortum	Partial	No	No
Gas Natural Fenosa	Full	Yes	No
GDF Suez	Partial	No	No
Iberdrola	Full	Yes	Yes, indicates it is not known
National Grid*	Partial**	Yes	No
RWE	Partial	Yes	No
Statkraft*	No***	No	No
TenneT	Full	Yes	No
Vattenfall*	Full**	Yes	Yes, indicates it does not collect this data
Veolia	No	N/A	N/A
Verbund	Full	Yes	No

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

\*\*\* No information found at the location referenced by Statkraft.

## LA6 - Workforce represented in health and safety committees

The LA6 indicator relates to the percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. The indicator is broken down into the following compilation points:

- The percentage of the total workforce represented in formal joint management-worker health and safety committees.
- The level(s) at which the committee(s) typically operates.

Of all the LA indicators included in this research, this is the one on which the fewest companies report. Of the 17 companies that make use of the GRI Guidelines, seven do not report on this indicator.

The following discrepancies are identified with companies indicating they report fully but do not actually address all of the compilation points:

- EDP/Hidrocantábrico: Does not report on the level(s) at which the committee(s) typically operate.

- ❑ Gas Natural Fenosa: Only provides the percentage of the workforce represented in health and safety (H&S) committees for Spain, but not for the other countries it is active in.

**Table 10: Companies' reporting on the LA6 compilation points**

Company	How does the company claim to report on this indicator?	The percentage of the total workforce represented in formal joint management– worker health and safety committees	The level(s) at which the committee(s) typically operates
ČEZ Group	N/A	N/A	N/A
DELTA*	No	N/A	N/A
DONG Energy	No	N/A	N/A
EDF*	No	N/A	N/A
EDP/Hidrocantábrico	Full	Yes	No
Enel	Full	Yes	Yes
E.ON	Partial	Yes	Yes
EVN	Full	Yes	Yes
Fortum	Full	Yes	Yes
Gas Natural Fenosa	Full	Partially	Yes
GDF Suez	Partial	No	Yes
Iberdrola	Full	Yes	Yes
National Grid*	No	N/A	N/A
RWE	No	N/A	N/A
Statkraft*	No	N/A	N/A
TenneT	No	N/A	N/A
Vattenfall*	Full**	Yes	Yes
Veolia	N/A	N/A	N/A
Verbund	Full	Yes	Yes

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## LA8 - Programs to assist workers and communities regarding serious diseases

The LA8 indicator relates to education, training, counselling, prevention and risk-control programs in place to assist workforce members, their families or community members regarding serious diseases. The indicator is broken down into the following compilation points:

- ❑ Education/training program(s) to assist workforce members, their families or community members.
- ❑ Counselling program(s) to assist workforce members, their families or community members.
- ❑ Prevention/risk control program(s) to assist workforce members, their families or community members.
- ❑ Treatment program(s) to assist workforce members, their families or community members.
- ❑ Whether there are workers involved in occupational activities who have a high incidence or high risk of specific diseases.



Assessment of this indicator is somewhat different from the other indicators, as each of the first four compilation points are further specifications of programmes that companies might have regarding serious diseases. It seems that companies need to specify what programmes they have in place, rather than addressing each of the compilation points (even when they do not have such programmes). Also, it needs to be specified whether these programmes apply to workers, workers' families and/or community members. Therefore, SOMO's analysis evaluates whether companies report in accordance with at least one of the first four compilation points, and with the final one. In Table 11, it is also specified for whom the programmes are designed.

Only three of the companies address the final compilation point that deals with the question of whether workers have a high incidence or risk of specific diseases. This seems to indicate that the sector does not face high occurrences of specific diseases, or that these diseases are not acknowledged by the companies.

There are seven companies (Dong Energy, EDP/Hidocantábrico, Enel, Gas Natural Fenosa, GDF Suez, RWE and Verbund) in this research that indicate full reporting on this indicator, but do not actually address this final compilation point. In response to SOMO questions regarding this finding, Dong Energy indicates that it has moved the description of occupational diseases to its reporting for LA7, and it also provides this information in the email communication.<sup>22</sup> Verbund indicates that its employees are not involved in occupational activities that have a high risk of specific diseases.<sup>23</sup> RWE does not specifically provide the information on this compilation point, but does refer to a number of specific diseases, such as work-related stress and the flu virus in discussions regarding its prevention programmes.

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<sup>22</sup> Dong Energy, responses to SOMO questions, email received 28 September 2012.

<sup>23</sup> Verbund, responses to SOMO questions, email received 4 October 2012.

**Table 11: Companies' reporting on the LA8 compilation points**

Company	How does the company claim to report on this indicator?	Education/training program(s) to assist workforce members, their families or community members	Counselling program(s) to assist workforce members, their families or community members	Prevention/risk control program(s) to assist workforce members, their families or community members	Treatment program(s) to assist workforce members, their families or community members	Whether there are workers who are involved in occupational activities who have a high incidence or high risk of specific diseases
ČEZ Group	N/A					
DELTA*	Partial**	For workers				No
DONG Energy	Full			For workers		No
EDF (Electricité de France)*	None					
EDP/Hidrocantábrico	Full	For workers		For workers		No
Enel	Full	For workers		For workers	For workers	No
E.ON	Partial	For workers		For workers		No
EVN	Full			For workers		Yes, mentions it has no employees in countries with communicable diseases
Fortum	Partial			For workers		No
Gas Natural Fenosa	Full	For workers				No
GDF Suez	Full	For workers			For communities	No
Iberdrola	Full	For workers, families and communities		For workers		yes
National Grid*	None					
RWE	Full			For workers		No, but implicit reference
Statkraft*	None					
TenneT	Partial			For workers	For workers	No
Vattenfall*	Full**			For workers		Yes
Veolia	N/A					
Verbund	Full	For workers	No	For workers	No	No

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## LA10 - Average hours of training per year per employee

The LA10 indicator relates to the average hours of training per year per employee by gender, and by employee category. The indicator consists of the following compilation point:

- Average number of hours of training per year per employee by employee category.

This indicator shows clear differences between the different companies. Three companies (Dong Energy, Fortum and Statkraft) do not report at all on this indicator, while four others (E.ON, Gas Natural Fenosa, RWE and TenneT) indicate that they report partially. Of this last category, Gas Natural Fenosa states that it intends to report fully on this indicator in 2013. The four companies that report on this indicator but do not actually indicate the extent of their reporting (DELTA, EdF, National Grid and Vattenfall) are all estimated to report partially.

For the remaining six companies that indicate full reporting (EDP/Hidrocantábrico, Enel, EVN, GDF Suez, Iberdrola and Verbund), the following discrepancies have been identified:

- EVN: Does not break down the figures by employee category.
- GDF Suez: Gives the average number of hours of training per year, but only per trained employee (not per all employees), and does not break down these figures by employee category.

**Table 12: Companies' reporting on the LA10 compilation points**

Company	How does the company claim to report on this indicator?	Average number of hours of training per year per employee by employee category
ČEZ Group	N/A	N/A
DELTA*	Partial**	No, only absolute numbers of employees that received training
DONG Energy	None	N/A
EDF (Electricité de France)*	Partial**	No, only absolute and relative numbers of employees that received training
EDP/Hidrocantábrico	Full	Yes
Enel	Full	Yes
E.ON	Partial	No, only provides a monetary figure
EVN	Full	Partially, not broken down per category
Fortum	None	N/A
Gas Natural Fenosa	Partial	Partially, not broken down per category
GDF Suez	Full	Partially, percentage given per trained employee (not per all employees) and not broken down per category
Iberdrola	Full	Yes
National Grid*	Partial**	Partially, not broken down per category
RWE	Partial	Partially, not broken down per category
Statkraft*	None	N/A
TenneT	Partial	No, only provides percentage of total staff budgeting
Vattenfall*	Partial**	No, but mentions that it does not report
Veolia	N/A	N/A
Verbund	Full	Yes

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

## 4. Sustainability reporting of energy company shareholders

The electricity sector has seen a wave of mergers, acquisitions and shifting ownership in recent years. One notable trend is an increase in investment from private equity firms and Chinese multinational corporations in European electricity companies. In addition to the review of the CSR/sustainability report of the 20 electric utilities in the chapter above, SOMO has also looked at the sustainability reporting of a number of investors in these companies. SOMO has looked at the following companies:

- ❑ China Three Gorges Corporation holds a 21.35% stake in EDP. This company last published a CSR/sustainability report in 2009.<sup>24</sup> In this report, the company does refer to the GRI Framework from 2006, but does not publish a GRI Content Index. This report is not featured in the GRI reporting database.
- ❑ Qatar Investment Authority holds an 8.1% stake in Iberdrola. This company does not seem to report on CSR or sustainability. No report was found on the company's website, nor is the company featured in the GRI reporting database.
- ❑ State Grid Corporation of China holds a 25% stake in Redes, a Portuguese grid company that is not featured in this report. It does publish an annual CSR report, the most recent of which seems to only be published in Chinese.<sup>25</sup> Previous reports are published in both English and Chinese.<sup>26</sup> According to the GRI reporting database, the 2011 report is in accordance with the G3 framework and does make use of the EUSS.<sup>27</sup>
- ❑ China Investment Corporation (CIC) owns a 30% stake in GDF Suez's exploration and production division. CIC does not seem to report on CSR or sustainability. No report was found on the company's website, nor is the company featured in the GRI reporting database.
- ❑ Allianz (rumoured to be interested in a stake in TenneT) published a CSR report using the GRI Framework. According to the GRI reporting database, the 2011 report made use of G3.1, had an A+ Application Level (which was GRI-checked) and was externally verified by KPMG.<sup>28</sup>
- ❑ Munich Re (rumoured to be interested in a stake in TenneT) published a CSR report using the GRI Framework. According to the GRI reporting database, the 2011 report made use of G3, had an Application Level 'B' (which was GRI-checked) and was not externally verified.<sup>29</sup>

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<sup>24</sup> China Three Gorges Corporation, "Annual Report of Environmental Protection 2009", [www.ctgpc.com/file/Environmental\\_Annual\\_Report\\_2009.pdf](http://www.ctgpc.com/file/Environmental_Annual_Report_2009.pdf) (11-09-12).

<sup>25</sup> State Grid Corporation of China website, "Corporate Social Responsibility Report 2011", <http://www.sgcc.com.cn/ywlm/socialresponsibility/brief/02/267393.shtml> (11-09-12).

<sup>26</sup> State Grid Corporation of China website, "Corporate Social Responsibility Report 2010", <http://www.sgcc.com.cn/ywlm/socialresponsibility/brief/01/265641.shtml> (11-09-12).

<sup>27</sup> Global Reporting Initiative, "Sustainability Reporting Database", <http://database.globalreporting.org/reports/view/9613> (11-09-12).

<sup>28</sup> Global Reporting Initiative, "Sustainability Reporting Database", <http://database.globalreporting.org/reports/view/9546> (11-09-12).

<sup>29</sup> Global Reporting Initiative, "Sustainability Reporting Database", <http://database.globalreporting.org/reports/view/11317> (11-09-12).

## 5. Results and analysis of company reporting on selected GRI Indicators

An analysis of the results of the detailed review of the companies' reporting on the selected GRI Indicators reveals a number of significant trends and patterns.

With regard to overall usage of the GRI Sustainability Reporting Framework, it is clear from Table 2 above that the framework is widely, but not universally, employed as a sustainability reporting tool in the European electricity industry. Two companies (ČEZ and Veolia) of the 20 selected for investigation in the present report do not currently use the GRI Guidelines, though Veolia has used it in the past. In addition, as revealed in Chapter 4, many of the corporate shareholders (i.e. owners) of European electric utilities – including private equity firms and Chinese multinational corporations – do not report using the GRI Guidelines.

### 5.1. Discrepancies in reporting

In analysing the actual reporting of the selected companies on the selected GRI Indicators, perhaps the most striking finding is the frequency of discrepancies between the degree to which a company *claims* that it reports on a certain indicator, and the actual degree of reporting based on the GRI Content Index and Checklist. The GRI Content Index and Checklist is a part of the GRI Reporting Framework that contains specific compilation points on which companies are expected to report for each indicator in order to receive 'full' reporting status for that indicator.

As is revealed in Table 13, of the 73 instances when a company claimed to have reported 'fully' on an indicator, there were 44 discrepancies whereby the company did not actually fully address all of the compilation points. In other words, more than 60% of the times that the companies claimed to (and received credit for) reporting fully on an indicator, the company did not actually report fully on the indicator.

Of the 17 companies in this study that do use the GRI Guidelines, SOMO found discrepancies in the reporting of 11 companies. In fact, the only companies for which discrepancies were not found were the six companies that did not claim to report fully on any of the selected indicators in their 2011 CSR report. The companies with the most discrepancies included EVN and Gas Natural Fenosa, for which SOMO found discrepancies in six of the ten indicators investigated.

Discrepancies on five indicators were found in the reporting of EDP/Hidrocantabólico, Iberdrola and Verbund; discrepancies on four indicators were found with Dong and Enel; three with RWE; and two indicators each with Fortum, GDF Suez and TenneT. It should be noted here that the number and types of discrepancies found were so widespread that it is difficult to single out any one company that has done better or worse than the others. A thorough investigation of all GRI Indicators would likely reveal at least some discrepancies among all companies.

**Table 13: Extent of reporting (including discrepancies) by company and indicator, 2012**

	EU14	EU15	EU16	EU17	EU18	LA1	LA4	LA6	LA8	LA10
ČEZ Group	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
DELTA*	n/a	n/a	n/a	n/a	n/a	Partial**	None	None	Partial**	Partial**
DONG Energy	Partial	Discrep.	Full	None	Full	Discrep.	Discrep.	None	Discrep.	None
EDF*	n/a	n/a	n/a	n/a	n/a	Partial**	Full**	None	None	Partial**
EDP/Hidrocontábrico	Discrep.	Discrep.	Full	Discrep.	Partial	Partial	Partial	Discrep.	Discrep.	Full
Enel	Discrep.	Full	Full	Full	Discrep.	Discrep.	Partial	Full	Discrep.	Full
E.ON	Partial	Partial	Partial	None	Partial	Partial	Partial	Partial	Partial	Partial
EVN	Discrep.	Discrep.	Partial	Discrep.	Partial	Discrep.	Discrep.	Full	Full	Discrep.
Fortum	None	None	Full	Discrep.	Partial	Discrep.	Partial	Full	Partial	None
Gas Natural Fenosa	Discrep.	Full	Full	Partial	Discrep.	Discrep.	Discrep.	Discrep.	Discrep.	Partial
Gazprom Neft	n/a	n/a	n/a	n/a	n/a	Partial	None	None	Partial	Partial
GDF Suez	n/a	n/a	n/a	n/a	n/a	Discrep.	Partial	Partial	Discrep.	Full
Iberdrola	Discrep.	Full	Full	Discrep.	Discrep.	Partial	Discrep.	Full	Full	Discrep.
National Grid*	n/a	n/a	n/a	n/a	n/a	Partial**	Partial**	None	None	Partial**
RWE	Discrep.	Discrep.	Full	Partial	Full	Partial	Partial	None	Discrep.	Partial
Statkraft*	Partial**	None	Partial**	None	Partial**	Partial**	Partial**	None	None	None
TenneT	None	None	None	None	None	Discrep.	Discrep.	None	Partial	Partial
Vattenfall*	Partial**	Partial**	Partial**	Partial**	Partial**	Partial**	Full**	Full**	Full**	Partial**
Veolia	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Verbund	Discrep.	Discrep.	Full	None	Discrep.	Partial	Discrep.	Full	Discrep.	Full

\* Company does not indicate the extent of its reporting on this indicator, only provides a yes (reports) or no (does not report) indication.

\*\* SOMO's evaluation of the company's reporting on this indicator.

In terms of the selected indicators on which the most discrepancies were found, EU14 and LA1 were revealed to be the most problematic. Seven discrepancies were found in reporting on each of these indicators, and none of the companies claiming to report fully on these indicators actually did so. EU14 is the most striking given that it is only relevant for the 13 companies that actually use the EUSS. This means that a discrepancy was found in the reporting for more than half (54%) of the companies for which the EU14 indicator is relevant. Seven discrepancies were also found in reporting on LA8, and six discrepancies were found on LA4. There was only one indicator (EU16) for which no reporting discrepancies were found. EU16, which is related to reporting on health and safety, was also the indicator with the highest number of 'full' reporting scores.

One of the areas of reporting in which discrepancies were found across a range of companies and indicators relates to information on labour issues among the employees of (sub)contractors. Many of the selected indicators contain one or several compilation points on (sub)contractors that are often left unanswered by companies. The degree, accuracy and specificity of information related to (sub)contractors is thus a major gap in reporting.

It is also notable that 10 of the 11 reports in which discrepancies were found had been externally 'assured' by a professional auditing company and had the application level checked and approved either by a third party or the GRI itself for an overview of the reports that have been externally assured and had the application level checked (see Table 1 for an overview of the reports that have been externally assured and had the application level checked). Some of the reports with the most discrepancies (e.g. EVN, Gas Natural Fenosa, Iberdrola and Verbund) were externally assured and checked at application level "A+", the highest level possible, by well-known professional auditors such as Lloyd's, PricewaterhouseCoopers, KPMG and Ernst & Young.

## 5.2. Reasons for discrepancies in reporting

Where a discrepancy was found, SOMO provided all of the companies concerned with a draft of the findings and requested that the companies review the draft and respond to a number of specific questions related to the discrepancies. Based on the companies' responses to the questions and draft, and based on SOMO's own analysis, it appears that the reasons behind the discrepancies are numerous and of a varying nature.

Perhaps the most fundamental reason behind the large number of reporting discrepancies found is related to the lack of clarity on the status of the compilation points in the GRI Content Index and Checklist and what 'full' reporting on an indicator actually means. As an integral part of the GRI Reporting Framework that is communicated clearly to all companies using the framework, the compilation points associated with each indicator can be assumed to be the basis for the degree of reporting on that indicator. If all compilation points of a certain indicator are fully addressed, a company can claim to report 'fully' on the indicator. Otherwise, the company can claim 'partial' or 'no' reporting. GRI staff have confirmed that any analysis of individual indicators should be made on the basis of these compilation points.<sup>30</sup> Nevertheless, some companies claim that the compilation points are for reference only and are not the determining factor for the degree of reporting.<sup>31</sup> This misunderstanding should be clarified by the GRI.

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<sup>30</sup> M. Fleur, Senior Manager Reporting Framework, GRI, interview with authors, 8 August 2012.

<sup>31</sup> Fortum, e-mail to SOMO, 30 September 2012.

A lack of clarity and common understanding surrounding the content of some of the compilation points (as well as their relevance to the operations of reporting companies) is also a clear reason for discrepancies in reporting. For example, Dong noted that the category 'supervised workers' (in LA1) is unclear and insufficiently defined within the GRI Framework.<sup>32</sup> Similarly, Dong noted that the requirement (in EU15) to report on workers' age with relationship to the 'retirement age' is not relevant for the majority of Dong's operations because there is no fixed retirement age in Denmark.<sup>33</sup> Iberdrola simply noted that it does not report on some of the compilation points (for example, in LA4) because they 'are not material'.<sup>34</sup> As noted above, the most discrepancies were found on the EU14 and LA1 indicators. Both of these are qualitative indicators, which require companies to provide more information than simple figures. The qualitative nature of these indicators could play a role in the high number of discrepancies.

Companies also found some of the compilation points repetitive. For example, Iberdrola commented that information on ensuring a skilled workforce (an EU14 compilation point) can be found throughout its report, so it was not necessary to restate it in one single area of the report for this indicator.<sup>35</sup> Verbund, Dong and Iberdrola indicated that some of the information they failed to provide on the indicators investigated in the present study could be found in their reporting on other indicators or was implicit in reporting on other compilation points.<sup>36</sup> The result is that the required information can be pieced together with some effort by a determined reader, but it is not provided integrally in the Content Index so that it is easily accessible and comparable with other companies.

In other cases, companies indicated that they simply do not have the methods or ability to report at the level of detail required by some compilation points. For example, Dong does report on contractor injury statistics for EU17, but noted that it does not yet have the measurement systems in place to detail the contractor data by employment type, contract or regulatory regime (although the company is working on improving the quality of this data).<sup>37</sup> This may be a key reason for the general lack of reporting by all companies regarding (sub)contractors.

Despite their reservations and criticisms about the lack of clarity and materiality of some of the indicators, it should be reiterated that – in each of the examples mentioned above – the companies nevertheless claimed to report 'fully' on the indicators in question.

In fact, it remains unclear what 'reporting' on an indicator or compilation point actually comprises. In several cases, companies have claimed to report 'fully' on an indicator simply by saying that they 'do not report' on that indicator. This is particularly the case with LA4, on which three 'fully reporting' companies simply report that they either do not know the answer to one (or more) of the compilation points or do not collect the relevant data. In at least one of these cases, the company in question indicated that it feels that it should get full credit on the indicator for reporting that it does not know the answer.<sup>38</sup> It is not clear whether the GRI Framework considers that such 'reporting to not report' actually comprises 'full' reporting.

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<sup>32</sup> Dong Energy, e-mail to SOMO, 28 September 2012.

<sup>33</sup> Dong Energy, e-mail to SOMO, 28 September 2012.

<sup>34</sup> Iberdrola, e-mail to SOMO, 28 September 2012. It should be noted that 'materiality' is something that the GRI addresses. So if a company says that it only reports on 'material' issues (e.g. only consolidated companies), this is in line with the GRI framework.

<sup>35</sup> Iberdrola, e-mail to SOMO, 28 September 2012.

<sup>36</sup> Verbund, e-mail to SOMO, 4 October 2012; Dong Energy, e-mail to SOMO, 28 September 2012; and Iberdrola, e-mail to SOMO, 28 September 2012.

<sup>37</sup> Dong Energy, e-mail to SOMO, 28 September 2012.

<sup>38</sup> Iberdrola, e-mail to SOMO, 28 September 2012.



It is striking how many of these discrepancies occurred in reports that had undergone external application level checks and assurances by professional auditors and by the GRI itself. It was outside the scope of this research to interview all of the auditing/assurance firms to identify the reasons behind why they would give their 'assurance' to the inconsistent reporting and inaccurate application level scores (this is a recommendation for future research). However, during the review process (see methodology section above), two of the electric utility companies (Fortum and Statkraft) forwarded the draft findings to their auditor/assurer, Deloitte, which also provided comments.

In the case of Fortum, two discrepancies were identified (on EU17 and LA1; see Table 13) in the company's report, which used Application Level B+. Regarding the discrepancy on EU17, Deloitte commented that it had only given assurance on the G3.1 version, but not on the EUSS indicators. Deloitte insisted that the Application Level B does not require use of the EUSS, and therefore these indicators did not need to be externally assured. However, it also acknowledged that the wording of Fortum's report using the EUSS 'to the extent possible' might mislead readers to think that the entire EUSS had been applied, unless explained otherwise. In response to the discrepancy in LA1, Deloitte explains that the level of gender breakdown in Fortum's report was deemed material in the assurance process, but acknowledged that compliance with the GRI Guidelines would have been stronger if this choice was explained in the GRI Content Index.<sup>39</sup>

SOMO did ask GRI staff about the high number of discrepancies in reports for which it had checked the application level. In response to SOMO's question, the GRI explained how it conducts the Application Level Check:

*"When we perform the Check we look at the GRI Content Index – whether the template has been filled in correctly, whether references are provided and if the reasons for omission for not reported Indicators are provided correctly. To make sure that the Content Index will help report readers find data, we perform a sample check of provided data. GRI does not check whether the information in the report is correct and accurately calculated. That is the responsibility of the reporting organization."<sup>40</sup>*

This means that, during its Application Level check, the GRI selects only a limited number of indicators and checks whether the information can be found in the pages indicated in the GRI Content Index. The selection of only a sample of indicators for the GRI Application Level Check, rather than a comprehensive check of all indicators, may thus explain why even reports that are externally checked receive a higher application level score than should be the case.

<sup>39</sup> Deloitte, email forwarded by Fortum, to SOMO, 11 October 2012.

<sup>40</sup> E. Sviklina, Manager Report Services, GRI, email to SOMO, 25 October 2012.

## 6. Conclusions and recommendations

Based on the above results and analysis of the CSR/sustainability reporting of 20 major European electricity companies on a selection of ten (labour-related) GRI Indicators, a number of important conclusions and lessons can be drawn. These conclusions can then be translated into recommendations to various stakeholder groups as to how the accuracy and overall benefit of corporate CSR/sustainability reporting can be improved. This chapter first outlines the most important conclusions, then the associated recommendations, in bullet point format.

### 6.1. Conclusions

#### **Conclusion 1:**

The GRI Framework is widely, but not universally, employed as a sustainability reporting tool in the European electricity industry.

However, it should be noted that, while a majority of major European electric utilities use the GRI Framework, many of the utilities' corporate shareholders – including private equity firms and Chinese multinational corporations – do not report according to the GRI Guidelines.

#### **Conclusion 2:**

There are systematic, widespread and significant discrepancies between what companies claim they are reporting on within the GRI Framework and what they actually report on. These discrepancies diminish the accuracy and credibility of the system and its contribution to encouraging sustainable and responsible business conduct.

SOMO's analysis revealed that more than 60% of the claims of 'full' reporting on the indicators included in this study are at least partly false or misleading. Some companies appear to be deliberately 'gaming the system' by taking advantage of the lack of clarity or irrelevance/immateriality of some indicators to give themselves 'full' credit (and thus receive a higher application level score) on indicators for which they are clearly not reporting fully. In other cases, however, the companies (often in their responses to draft results provided by SOMO) provided well-founded and logical explanations (e.g. lack of clarity, relevance or materiality) for why they were unable or unsure how to report on a certain issue.

The fact that SOMO found so many of the claims of 'full' reporting on indicators included in the present study to be at least partly false or misleading indicates a serious flaw in the system. While on the one hand no discrepancies were found in the reporting of some companies, on the other hand some companies exhibited discrepancies on six out of ten indicators. This inconsistency renders comparisons of companies based on their reported GRI Application Level meaningless. Decisions (such as whether or not to invest in a company) based on such inaccurate comparisons risk being erroneous and can potentially have negative impacts for society and the economy. The lack of clarity surrounding the reporting process (e.g. usage of the compilation points for 'full' reporting score, the definition of 'reporting', etc.) and the content of several indicators thus significantly diminishes the accuracy and credibility of the system and its contribution to encouraging sustainable and responsible business conduct.

This conclusion also has broader implications for the role of businesses and their impact on society, the environment and the economy. The lack of information on corporate performance is a major factor inhibiting corporate accountability and responsible behaviour. If the right information is not collected, analysed and duly disclosed, it is difficult for affected communities and individuals, the general public, consumers, investors, or even the very management of these companies, to understand the scope and impact of their operations on society. Disclosure of the right information is also vital to ensure that affected people and communities are able to assert their rights. It enables stakeholders and the public to fulfil their role as 'watchdog' with regard to companies' environmental and human rights performance, and provides tools for companies to carry out human rights due diligence. Transparency and accountability on financial and non-financial impacts are also key to restoring a level of stability and predictability to financial markets, as well as shareholder and stakeholder trust in business, which together are the foundation for a sound economic recovery from the current global economic crisis.

There is a clear need to sharpen and clarify the content of the indicators, as well as the procedures for assigning a 'full' or 'partial' reporting status on individual indicators. Several suggestions about how to do this (based on the findings and analysis in the present report) can be found in the following 'Recommendations' section.

**Conclusion 3:**

The system in place to verify the accuracy of GRI Application Levels is insufficient. A lack of will and ability to properly monitor and verify usage of the GRI Framework further diminishes the accuracy and credibility of the system and its contribution to encouraging sustainable and responsible business conduct.

SOMO found discrepancies in 10 of the 12 corporate reports that had been externally assured and/or checked by a third party auditor or the GRI itself. In fact, some of the reports with the most discrepancies (in several cases on six of the ten indicators) were externally assured and checked at application level "A+", the highest level possible. The fact that so many externally assured and checked reports were found to have discrepancies calls into question the credibility of the assurance system associated with the GRI Reporting Framework.

There is thus a clear need to improve the system of monitoring, verifying, checking and assuring the reporting and reporting scores of companies using the GRI Guidelines. Several suggestions for improvements (based on the findings and analysis in the present report) can be found in the 'Recommendations' section below.

**Conclusion 4:**

The high frequency of discrepancies and inaccuracies in the GRI Framework reveal the fundamental shortcomings and inadequacy of (even well-intended) voluntary systems of reporting and disclosure.

The debate about the effectiveness of voluntary versus mandatory approaches to corporate accountability and corporate responsibility (of which corporate reporting and disclosure on financial and non-financial issues is a part) is a long and complex one. Suffice to say that there is a role and a need for both approaches in an effective framework for ensuring responsible business conduct.

Voluntary and self-regulatory initiatives such as the GRI can add value to a comprehensive framework for sustainability reporting. Voluntary initiatives can drive and highlight best practice and encourage innovative front-runners to continually strive to improve. They encourage leadership and innovation and can improve leaders' business credentials and therefore competitiveness.

In order to do so, however, it is absolutely crucial that such voluntary initiatives should be codified and credible. The present report has revealed several critical shortcomings with the GRI Framework that have led to widespread discrepancies and inaccuracies that are weakening the GRI's credibility. If voluntary systems like the GRI Framework are to remain credible, they cannot allow misuse and potential abuse of the system to go without consequences for the offending party.

Given the challenges faced by voluntary initiatives in ensuring compliance and preventing abuse without the instrument of sanctions at their disposal, there is a need for a binding European framework of financial and non-financial reporting to create a level playing field for businesses operating across Europe and for ensuring that minimum standards are respected. This is particularly the case in an area of such crucial social and economic importance as corporate reporting and disclosure (see the comments made in Conclusion 2 above). The research findings in the present report contribute arguments to the call for a clear, harmonised and enforceable framework of mandatory non-financial reporting for all European large and multinational enterprises. Such a framework should ensure that companies disclose the adverse social and environmental impacts and risks linked to their operations and how these are addressed (i.e. their due diligence processes). In such a framework, corporate reports would have legal status and provide information on the structure of the group of companies and its sphere of influence. A set of key indicators should be provided to ensure that key impacts are addressed and comparability of the companies' reports. Effective enforcement (including monitoring and verification) of these reporting requirements should be ensured. The public should have access to this information and procedures to challenge the information disclosed should be put in place.

## 6.2. Recommendations

The overall analysis of the companies' reporting on the selected GRI Indicators generates a number of significant implications and lessons for various stakeholder groups involved or interested in sustainability reporting, as well as non-financial disclosure in general. Based on the above conclusions and implications, recommendations to the following stakeholder groups are provided:

- ❑ The GRI, particularly in the context of the current development of the G4 version of the Sustainability Reporting Guidelines
- ❑ Companies using the GRI Reporting Framework
- ❑ The European Parliament, the European Commission and individual European governments
- ❑ Professional auditors and assurers hired to assure CSR/sustainability reports and/or to conduct application level checks
- ❑ National and international unions, European works councils (EWCs) and other civil society organisations interested in non-financial reporting and disclosure
- ❑ Investors, benchmarking organisations and others that use the GRI Application Levels of reports in making (investment) decisions about companies.

### **Recommendations to the GRI, particularly in the context of the current development of the G4 version of the Sustainability Reporting Guidelines:**

- ❑ Make it irrefutably clear to companies using the GRI Framework that 'full' reporting on an indicator implies addressing each and every compilation point for the indicator.
- ❑ Do not allow companies to claim that they 'report' on an indicator without indicating whether they report 'fully' or 'partially'.
- ❑ Improve the clarity, specificity and relevance of the indicators and compilation points. Review SOMO's detailed findings – as well as the responses from the companies – for

each of the ten labour indicators in Chapter 3. The findings and company responses provide crucial insight into how to improve the indicators and compilation points.

- Pay special attention to increasing the clarity and relevance of indicators and compilation points related to (sub)contractors, as reporting fully on these indicators/points proved to be the most problematic for companies.
- Make it clear to companies using the GRI Guidelines that reporting that they do not know the answer to a particular indicator or compilation point does not qualify as 'full' reporting.
- Improve the accuracy and the credibility of the system of verification by:
  - having all reports undergo an application level check by the GRI itself,
  - do a broad check of actual reporting on as many indicators as possible, at least all of the indicators on which the company claims to report 'fully'
  - do a periodic review of the quality of the assurance being provided by professional assurance companies.
- Introduce consequences for companies whose claims about the completeness of their reporting on GRI Indicators are found to be inaccurate. This could be done by, for example, downgrading the application level score of inaccurate reports, making the fact that the report has been downgraded publicly known, and putting offending companies on 'probation' (for example, for a period of two years), during which time a company has to demonstrate that its reports are accurate.

#### **Recommendations to companies using the GRI Reporting Framework:**

- Continue to use the GRI Guidelines in your CSR/sustainability reporting and make a genuine commitment to accurate and honest reporting. The joint statement on CSR by the European electricity sector social partners recognises the GRI Framework as an important sustainability reporting tool, and encourages European electricity companies to understand the indicators and use them as a reference standard when developing CSR policies.<sup>41</sup>
- Do not claim 'full' reporting on an indicator unless you have actually provided information that fully addresses each and every compilation point associated with that indicator.
- If there are indicators or points that you do not understand or do not collect information on, contact the GRI to request clarification. If you are still unable to provide information, give yourself a 'partial' score on the indicator and explain why you could not provide full information. Reporting that you do not know should not be counted as 'full' reporting.
- If you feel that reporting on a certain topic has been covered under your reporting on another indicator, be sure to include a reference to the exact place in your reporting where the information can be found. If the information is not exactly what is asked for, or is not in the same format as requested by the second indicator, make the effort to report it again in the format requested. This will improve clarity for your readers and facilitate comparison with other companies' reports.
- Pay special attention to improving measurement methods and reporting practices for indicators and compilation points related to (sub)contractors, as reporting fully on these indicators/points proved to be the most problematic for companies.

<sup>41</sup> EPSU, Eurelectric and EMCEF (2009). *Joint Position on the Social Aspects of Corporate Social Responsibility in the European Electricity Industry*. EPSU, Eurelectric and EMCEF, Brussels, <<http://www.epsu.org/a/5343>> (16 October 2012).

### **Recommendations to the European Parliament, the European Commission and individual European governments:**

- ❑ Continue to encourage European businesses to use the GRI Guidelines in their CSR/sustainability reporting and to make a genuine commitment to accurate and honest reporting.
- ❑ Encourage improvements in the GRI Framework, particularly with regard to the monitoring and verification of application level scores.
- ❑ At the same time, recognise the need to genuinely and effectively create a level playing field for business activity in Europe by putting in place a clear, harmonised and enforceable framework of mandatory non-financial reporting for all European large and multinational enterprises. Such a framework should ensure that companies disclose the adverse social and environmental impacts and risks linked to their operations and how these are addressed (i.e. their due diligence processes). In such a framework, corporate reports would have legal status and provide information on the structure of the group of companies and its sphere of influence. A set of key indicators should be provided to ensure that key impacts are addressed, as well as the comparability of the companies' reports. Effective enforcement (including monitoring and verification) of these reporting requirements should be ensured. The public should have access to this information and procedures to challenge the information disclosed should be put in place. The announced draft of legislation on non-financial reporting provides a clear opportunity to improve companies' transparency towards these ends.

### **Professional auditors and assurers hired to assure CSR/sustainability reports and/or conduct application level checks:**

- ❑ Make it clear in the audit/assurance statement exactly which level of the GRI Guidelines and/or sector supplements have been audited.
- ❑ Use the compilation points provided by the GRI to guide the auditing/assurance process and ensure that 'fully' reported indicators address *all* compilation points.
- ❑ For each report audited/assured, make publicly available an inventory of all of the indicators checked and the auditor's/assurer's estimation of the degree of reporting (full, partial, none) on each indicator.

### **Recommendations to national and international unions, European works councils and other civil society organisations interested in non-financial reporting and disclosure:**

- ❑ Use the findings and analysis in this report to engage the management of European companies, in particular the CSR/sustainability departments, to demand more detailed and accurate reporting using the GRI Framework. Unions and EWCs could particularly focus on encouraging improvements in reporting on issues surrounding contractors and subcontractors, as this is a major gap in reporting revealed by the present report.
- ❑ Use the findings and analysis in this report to engage the GRI using the concrete recommendations provided above on how to improve the framework. This could be done through better clarifications of the compilation points (e.g. what are supervised workers), better communication regarding the function of these compilation points (guidance or requirements) and providing more detailed guidance to either companies or assurance firms about how to evaluate each indicator. Given that most EWC agreements foresee the use of an expert, EWCs should consider using an expert to assist the EWC in evaluating their company's CSR report.

- Use the findings and analysis in this report to engage politicians at the national and European level on the need for a clear, harmonised and enforceable framework of mandatory non-financial reporting for all European large and multinational enterprises. Alongside voluntary initiatives such as the GRI, a mandatory reporting framework is needed to create a level playing field for business activity in Europe.

**Recommendations to investors, benchmarking organisations and others that use the GRI Application Levels of reports in making (investment) decisions about companies:**

- Be aware of the fact that the GRI system for assigning and 'checking' application level scores of corporate reports is currently unreliable and avoid basing decisions on a superficial assessment of the application level of a company's report.
- Rather than basing decisions on a self-reported or even externally assured report, take a moment to read through the company's report yourself, focusing on the indicators that are most important or relevant for you, and evaluate for yourself whether the company is adequately addressing the indicator and its compilation points. For those companies with an EWC, consider contacting the EWC secretariat (workers' side) to learn their views on the company's CSR policy.

**Suggestions for further research:**

- The scope of the present study only allowed for the detailed investigation of a selection (ten) of the dozens of indicators in the GRI Reporting Framework. It is possible (though not necessarily likely) that there are more discrepancies in reporting on labour issues than other social and environmental areas. Future studies should expand the detailed analysis performed in the present study to other indicators and thematic areas.
- Future studies should also include a more thorough investigation into the practices of the professional auditing/assurance firms that check the information provided in and the application level of reports.

## Annex 1: List of sources of reporting information for each company

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### EDP Hidrocarbóric

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**Enel**

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