



ecovadis

EcoVadis Sustainability Assessment Report

Company rated:
WINGU SP Z OO

Overall score: 80 /100
May 2024

Sustainability performance: Advanced

Size: XS

Headquarters country: Poland

Risk country operations: No

Industry: Computer programming, consultancy and
related activities

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ABOUT SUSTAINABILITY

Sustainability is the continuing commitment to act responsibly by integrating social and environmental concerns into business operations. Sustainability goes beyond regulatory compliance to focus on how companies manage their economic, social and environmental impacts, as well as their relationships with stakeholders (e.g. employees, trading partners, government).

ABOUT THE ASSESSMENT

The EcoVadis methodology framework assesses companies' policies and actions as well as their published reporting related to the environment, labor and human rights, ethics and sustainable procurement. Our team of international sustainability experts analyze and crosscheck companies' data (supporting documents, 360° Watch Findings, etc.) in order to create reliable ratings, taking into account each company's industry, size and geographic location.

ABOUT ECOVADIS

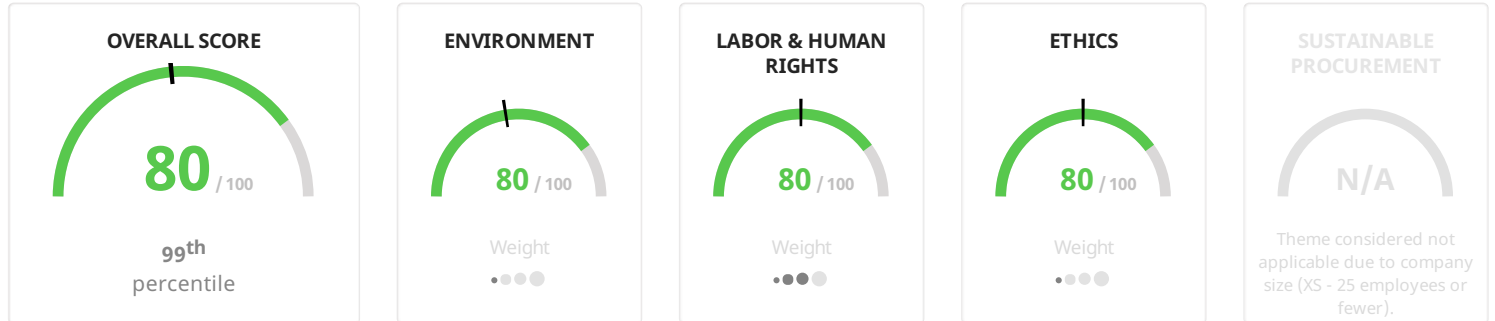
EcoVadis provides the leading solution for monitoring sustainability in global supply chains. Using innovative technology and sustainability expertise, we strive to engage companies and help them adopt sustainable practices.

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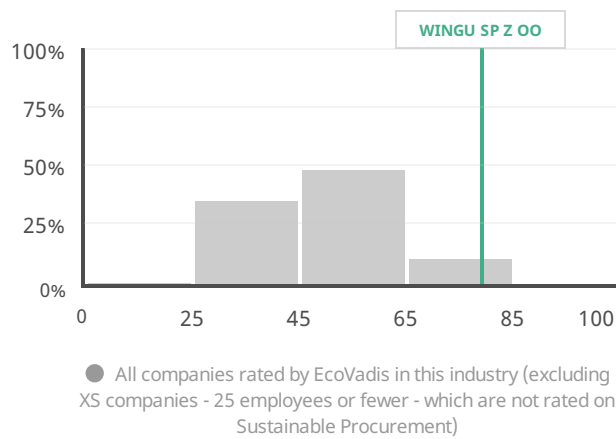
1. SUSTAINABILITY PERFORMANCE OVERVIEW

Score breakdown

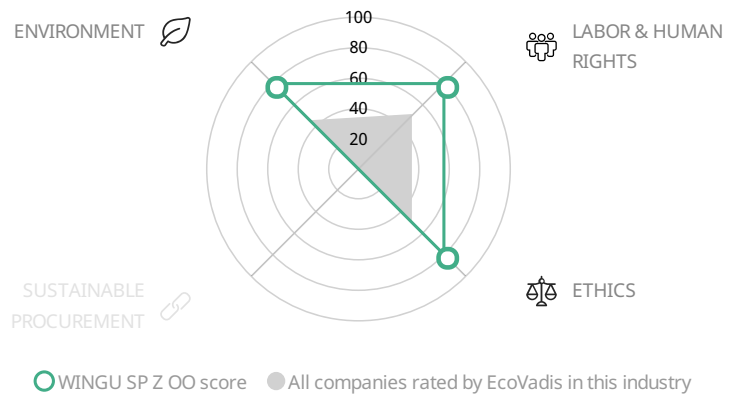
Sustainability performance ● Insufficient ● Partial ● Good ● Advanced ● Outstanding — Average score



Overall score distribution



Theme score comparison



WINGU SP Z OO has received a Platinum Medal in recognition of its sustainability achievement. This award places it in the top of companies assessed by EcoVadis over the past 12 months.

Corrective Action Plan in progress

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. WINGU SP Z OO has a corrective action plan in place and is working on improving their sustainability management system.

* You are receiving this score/medal based on the disclosed information and news resources available to EcoVadis at the time of assessment. Should any information or circumstances change materially during the period of the scorecard/medal validity, EcoVadis reserves the right to place the business' scorecard/medal on hold and, if considered appropriate, to re-assess and possibly issue a revised scorecard/medal.

2. ASSESSMENT BENEFITS

Understand :

Get a clear picture of a company’s sustainability performance. The scorecard is the final output of the EcoVadis assessment. It rates and benchmarks a company’s sustainability performance in four themes on a scale of 0-100 and highlights strengths and improvement areas.

Know where a company stands compared to their industry. Benchmark the company’s sustainability performance against the industry with a score distribution graph and theme score comparisons.

Identify industry trends. Discover the primary sustainability risks, regulations, hot topics and best practices related to specific industries.

Communicate :

Meet customer needs. More and more companies raise questions about their trading partners’ environmental and social performance. The EcoVadis assessment allows companies to demonstrate their commitment.

Leverage a unique communication tool. Companies with an EcoVadis Scorecard avoid audit fatigue by sharing one assessment with all requesting customers.

3. ASSESSMENT PROCESS

1

Customer Request

Procurement, CSR, EHS, and Sustainability leaders in enterprises looking to monitor sustainability risk in the supply chain request an EcoVadis assessment for their trading partners.

2

Questionnaire

Based on a company’s specific sustainability risk factors, a customized questionnaire is created. It contains 20 to 50 questions tailored to the industry, size and location.

3

Document Analysis

Companies are required to provide supporting documentation for their answers to the questionnaire. These documents are reviewed by our analysts.

4

Public Information

Company information that is publicly available, most often found on the company website, is also collected as evidence of their sustainability performance.

5

360° Watch Findings

360° Watch Findings comprise relevant public information about companies’ sustainability practices, identified via more than 10,000 data sources. They can have positive, negative or no score impact.

6

Expert Analysis

Our analysts combine all these elements to produce one unified scorecard per company.

SCORECARD



4. ECOVADIS METHODOLOGY

A. Four Themes and 21 Criteria

EcoVadis assessments focus on 21 issues which are grouped into 4 themes (Environment, Labor & Human Rights, Ethics, Sustainable Procurement). The 21 issues or criteria are based upon international sustainability standards such as the Global Compact Principles, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standard, the ISO 26000 standard, and the CERES principles.

21 sustainability criteria

1. ENVIRONMENT

OPERATIONS

- Energy consumption & GHGs
- Water
- Biodiversity
- Air Pollution
- Materials, Chemicals & Waste

PRODUCTS

- Product Use
- Product End-of-Life
- Customer Health & Safety
- Environmental Services & Advocacy

2. LABOR & HUMAN RIGHTS

HUMAN RESOURCES

- Employee Health & Safety
- Working Conditions
- Social Dialogue
- Career Management & Training

HUMAN RIGHTS

- Child Labor, Forced Labor & Human Trafficking
- Diversity, Equity & Inclusion
- External Stakeholders Human Rights

3. ETHICS

- Corruption
- Anticompetitive Practices
- Responsible Information Management

4. SUSTAINABLE PROCUREMENT

- Supplier Environmental Practices
- Supplier Social Practices



B. Seven Management Indicators

EcoVadis assessments evaluate a company's sustainability management system by looking at seven management indicators. These are used to further customize the assessment by weighting the four themes and their subsequent 21 sustainability criteria.



Policies (weight: 25%)

1. Policies: Mission statements, policies, objectives, targets, governance
2. Endorsement: Endorsement of external sustainability initiatives

Actions (weight: 40%)

3. Measures: Measures and actions implemented (e.g. procedures, training, equipment)
4. Certifications: Certifications and labels (e.g. ISO 14001)
5. Coverage: Coverage of measures and actions

Results (weight: 35%)

6. Reporting: Reporting on Key Performance Indicators (KPIs)
7. 360: Condemnations, Controversies, Awards

5. UNDERSTANDING A SCORECARD

The overall score can be better understood by looking at quantitative information (theme scores and activated criteria) and qualitative information (strengths and improvement areas).

A. Quantitative Information: Scores & Activated Criteria

Theme Scores:

Like the overall score, theme scores are on a scale of 1 to 100.

Activated Criteria:

Each of the four themes (Environment, Labor & Human Rights, Ethics, Sustainable Procurement) have specific criteria associated with them. Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Non-activated

If certain criteria are not activated, then the specific associated issue is not relevant or has very low sustainability risk for that company.

B. Qualitative Information: Strengths & Improvement Areas

Qualitative information provides more details and insights into a company's score. For each theme, the company is assigned strengths (elements of their sustainability management system that are positive) and improvement areas (elements of their sustainability management system that need to be improved). The strengths and improvement areas are divided according to the three management layers (Policies, Actions, Results) and are also classified by priority.

All improvement areas are automatically added to the company's Corrective Action Plan. They are pre-organized by priority. The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback.

Medium

Medium importance criteria are the issues some sustainability risk is present but not the most pressing.

High

High importance criteria are the issues where the company faces the greatest sustainability risk.

! Risk countries only

Criteria classified as Only in Risk Countries are activated only if the company has significant operations in one or more countries identified as risky.

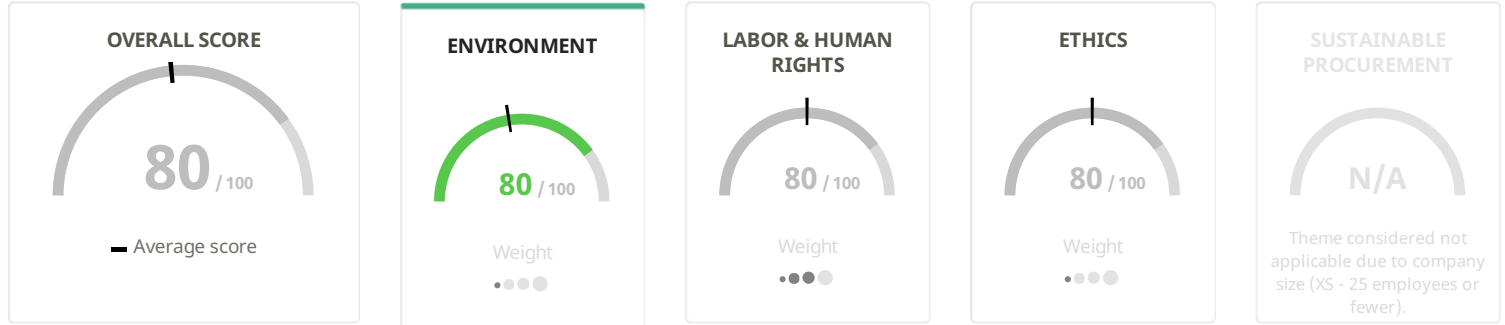
C. The Scoring Scale

0 - 24	Insufficient	No engagements or tangible actions regarding sustainability. Evidence in certain cases of misconduct (e.g. pollution, corruption).
25 - 44	Partial	No structured sustainability approach. Few engagements or tangible actions on selected issues. Partial reporting on Key Performance Indicators. Partial certification or occasional labeled product.
45 - 64	Good	Structured and proactive sustainability approach. Engagements/policies and tangible actions on major issues. Basic reporting on actions or Key Performance Indicators.
65 - 84	Advanced	Structured and proactive sustainability approach. Engagements/policies and tangible actions on major issues with detailed implementation information. Significant sustainability reporting on actions and Key Performance Indicators.
85 - 100	Outstanding	Structured and proactive sustainability approach. Engagements/policies and tangible actions on all issues with detailed implementation information. Comprehensive sustainability reporting on actions and Key Performance Indicators. Innovative practices and external recognition.

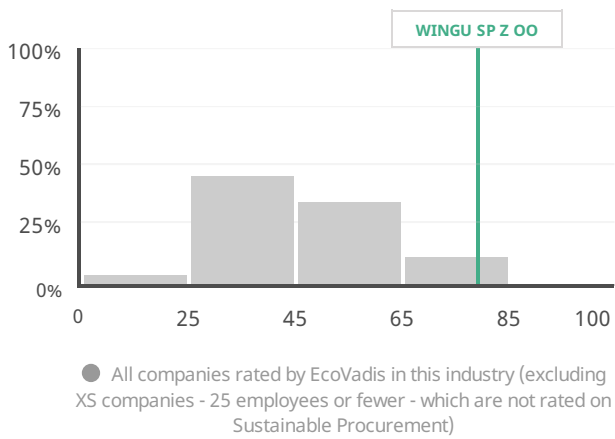
6. ENVIRONMENT

This theme takes into account both operational factors (e.g. energy consumption, waste management) and product stewardship (e.g. product end-of-life, customer health and safety issues).

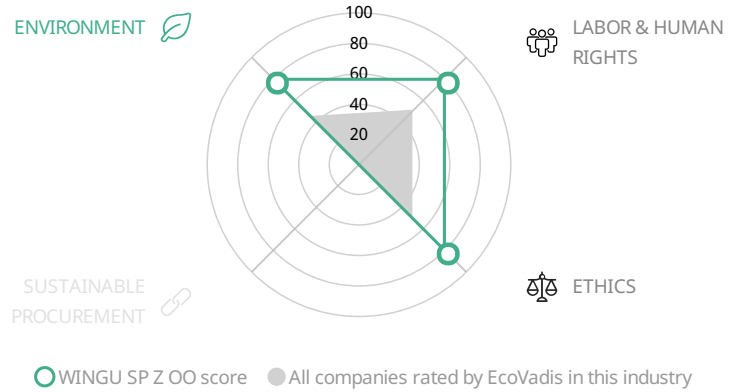
Environment Score Breakdown



Theme score distribution



Theme score comparison



Environment: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Environment: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

Strengths

Policies

Standard policy on environmental issues

Information

The company has standard environmental policies covering some relevant environmental topics based on the company's business activity.

Guidance

To improve from a standard to a comprehensive environmental policy, the company should implement policies on most/all the relevant environmental topics. The company should also have policy target/s which include/s an absolute or relative quantitative achievement and a specific future deadline (from present year onwards). For example: The company is committed to recycle 100% of waste generated by 2030. The policy should also be regularly reviewed.

Environmental policy on waste

Environmental policy on energy consumption & GHGs

Actions

Internal sorting & disposal of waste according to waste streams

Actions or training to raise employee awareness on waste reduction & sorting

Purchase and/or generation of renewable energy

Employee awareness/training program on energy conservation

Information

The company has a specific awareness (and training) program for employees on reducing energy consumption.

Guidance

Awareness programs might include brochures given to employees, notices displayed in the workplace areas, presentation used during meetings in order to engage employees on reducing energy consumption. Some examples of areas it could cover include turning off lights at the end of the day, switching off electrical appliances when not in use, selecting energy-efficient equipment (e.g. for facilities management or procurement department staff), and optimizing machinery use (e.g. stand-by vs active for workshop operatives).

Results

Environmental reporting on waste

Environmental reporting on energy consumption & GHGs

Information

The company has formalized reporting document(s) on energy consumption & GHGs.

Guidance

The company provided documents that includes relevant energy and GHGs (greenhouse gases) related KPIs (Key Performance Indicators), annual energy consumption report, sustainability report, etc. Some examples of KPIs (Key Performance Indicators) provided on this criteria: annual electricity consumption, renewable energy consumption, fuel consumption, total GHG/CO2 emissions, number of trainings conducted on energy conservation among employees.

Reporting on total energy consumption

Information

The company has reported KPIs with regard to total energy consumption either through formal documentation or questionnaire declaration.

Guidance

Total energy consumed represents total primary energy consumption reported in kWh. Total energy consumed may include e.g. consumption of coal and coke (in Kg) reported in kWh and/or consumption of oil, LPG and electrical power in kWh.

Comprehensive reporting on environmental issues

Information

The company has provided comprehensive reporting figures or Key Performance Indicators (KPIs) on the majority of relevant environmental issues.

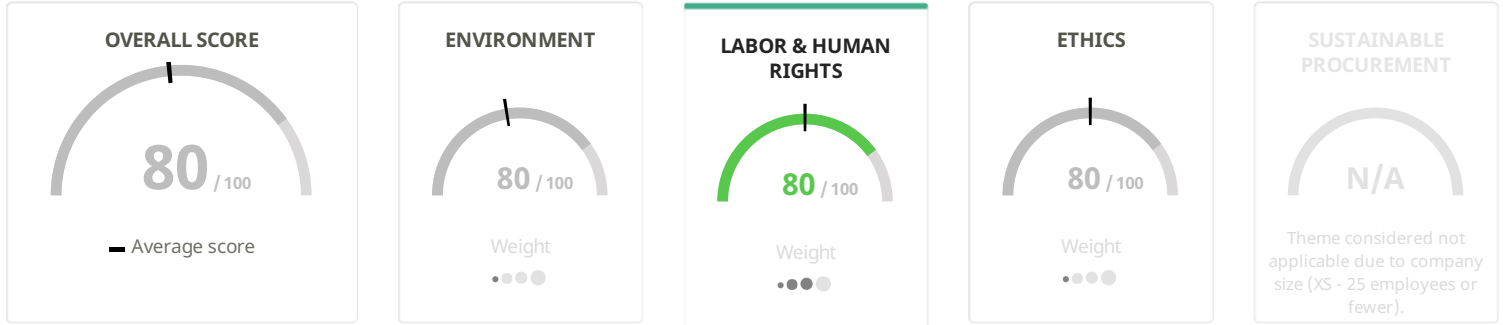
Guidance

The company has provided good quality KPIs on the majority of environmental criteria. To make the reporting figures more advanced in terms of quality, quantity and transparency, the KPIs should have all the following quality factors; (1) External assurance to assess the quality and credibility of the qualitative and quantitative information reported by the organization, (2) Alignment with reporting standards such as GRI Core/Universal/Comprehensive, SASB,...etc. (3) Materiality analysis to identify the most relevant environmental issues based on the company's activity (4) The reporting timespan should be extending over 36 months for the majority of activated criteria and the reporting figures should not be more than 2 years old. (XS company: KPIs/reporting figures provided on at least two material environmental topics which extends over a period of 24 months or more)

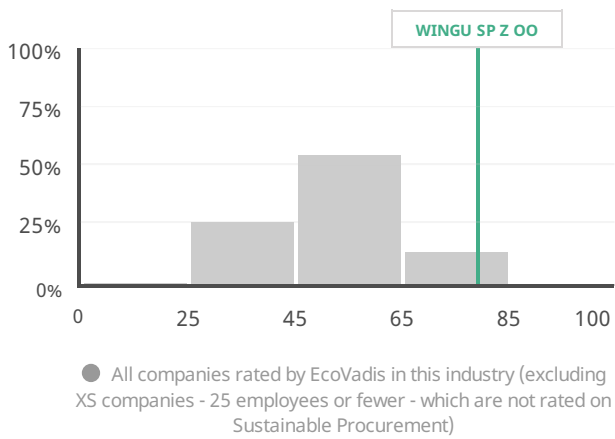
7. LABOR & HUMAN RIGHTS

This theme takes into account both internal human resources (e.g. health and safety, working conditions, career management) and human rights issues (e.g. discrimination and/or harassment, child labor).

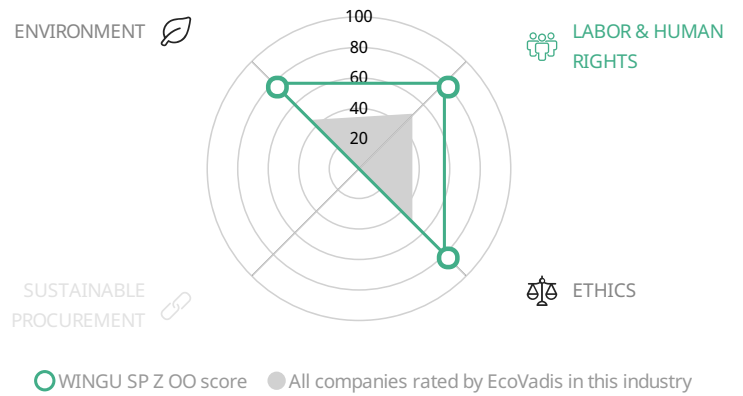
Labor & Human Rights Score Breakdown



Theme score distribution



Theme score comparison



Labor & Human Rights: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Labor & Human Rights: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.



Strengths

Policies

Standard policy on labor & human rights issues

Information

The company has standard labor & human rights policies covering some relevant labor & human rights topics based on the company's business activity.

Guidance

To improve from a standard to a comprehensive labor & human rights policy, the company should implement policies on most/all the relevant labor & human rights topics. The company should also have policy target/s which include/s an absolute or relative quantitative achievement and a specific future deadline (from present year onwards). For example: The company is committed to train 100% of employees on health and safety by 2024. The policy should also be regularly reviewed.

Labor & human rights policy on diversity, equity & inclusion

Labor & human rights policy on employee health & safety

Actions

Employee health and safety emergency action plan

Information

The company has formal procedures that have been communicated to all employees regarding accidents, injuries, provision of emergency equipment, emergency evacuation, first aid, fire drills and other situations regarding health and safety at the workplace.

Guidance

A health and safety emergency action plan is a document that demonstrates the health and safety plan created by each company in order to guide its employees when facing emergency situations. These emergency situations depend on the operations of the company as well as their workforce, but also include accidents related to operations of heavy equipment, injuries, fires, chemical spills, explosions, falls, among others.

Compensation for extra or atypical working hours

Information

The company provides additional remuneration to compensate for overtime work.

Guidance

Extra or atypical hours refers to all hours worked in excess of the normal hours (could be overtime hours for instance). Employees should be provided additional compensation for overtime and/or other forms of atypical working hours.

Flexible organization of work (eg. remote work, flexi-time)

Information

The company has official measures to promote work-life balance in place, which have been found within the supporting documentation. The company provides flexible hours and organization for employees to work.

Guidance

The company has implemented working practices that acknowledge and aim to support the needs of staff in achieving a balance between their home and working lives. The company has supporting documentation showing a flexible organization of working hours is provided for employees, which can include evidence of options for part-time work, telecommuting or remote work, job-shares, and other forms of variable work schedules.

Employee health & safety risk assessment

Information

The company has provided documents which demonstrate that an employee health and safety risk assessment has been conducted. The assessment took into consideration the daily operational tasks of employees, the health and safety hazards present at the workplace and the associated risks and has a proposed corrective action plan to address these identified risks.

Guidance

A health and safety risk assessment is systematically conducted to identify and evaluate the potential impact of operational tasks or conditions on employees' health and safety. The main elements of a complete risk assessment are; 1) description of hazards or risk factors identified to have the potential to cause harm and determining the significance of the risks. 2) periodic review of risks to reflect the latest risks and health and safety environment in the business. 3) presence of a preventive and corrective action plan in the form of steps and/or recommendations that an organization needs to take to effectively prevent and address the risks identified, mapped & evaluated in risk assessments. If applicable, the results of a health and safety risk assessment should be made available to relevant stakeholders such as employees, members of the health and safety committee, staff representatives, the occupational physicians, and labor inspectors.

Regular assessment of individual performance

Information

The company demonstrates evidence of regular assessments of individual performance.

Guidance

The company has a process in place to quantitatively and/or qualitatively assess and review employee's job performance on a regular basis. This includes processes such as performance reviews to allow the company to identify areas for improvement, provide support and guidance to employees as well as recognizing and rewarding top performers.

Regular employee health check-up

Information

The company has been conducting regular health screening tests for employees.

Guidance

The company has made regular health check arrangements for employees through health service contracts or employee health surveillance procedures. These periodical and relevant occupational health check-ups provided to employees have had a particular focus on the health risk factors that the employees are exposed to at the workplace. Some of the health risks are; exposure to chemicals, potentially dangerous machines, noise, or other potential hazards to allow for early detection of effects on health and timely treatment.

Provision of skills development training

Information

The company provides training to its employees to develop their skills.

Guidance

The company has implemented vocational training and instruction, which include skills development training, education paid for in whole or in part by the company, with the goal to provide opportunities for career advancement (Source: Global Reporting Initiative G3). Examples of on-the-job training to enhance employee skills are coaching, mentoring, job rotation, apprenticeships, etc. Total number of hours of training per employee per year can be a significant key performance indicator for this action.

Training of employees on health and safety risks and best working practices

Information

The company has provided its employees with necessary training to strengthen their knowledge about health and safety risks at work and good working practices.

Guidance

The company has provided training with the help of training materials (slide decks, training content summaries) and/or evidence of training execution (progress reports, certificates of completion, attendance sheets) to demonstrate the execution of training programs regarding health and safety risks at work and good working practices. A best practice is to have a training matrix which helps to keep track of which employees have been trained, the date of the training, the training topic, and expected dates for refresher trainings. Monitoring of training attendance certificates is also suggested. It is also a best practice to have the training carried out in the language that the employees understand best and to carry out tests or quizzes to ensure training concepts have been successfully transmitted to participants.

Results

Labor & human Rights reporting on diversity, equity & inclusion

Information

The company has formalized reporting document(s) on diversity, equity & inclusion.

Guidance

"The company provided documents that includes reporting on diversity, wage equality, internal excel database, management presentation that includes reporting on employee diversity and inclusion. Some examples of KPIs (Key Performance Indicators) provided on this criteria are number of employees trained on prevention of discrimination and harassment or on promotion of DE&I, percentage of female employees. "

Labor & human rights reporting on career management & training

Information

The company has formalized reporting document(s) on career management & training.

Guidance

"The company provided documents that includes reporting on annual training, annual employee development, internal excel database, management presentation that includes reporting figures on career management and training of employees. Some examples of KPIs (Key Performance Indicators) provided on this criteria are total training hours or average training hours per employee, number of employees with regular performance review. "

Labor & human rights reporting on employee health & safety

Information

The company has formalized reporting document(s) on employee health & safety.

Guidance

"The company provided documents that includes reporting on health and safety training, internal excel database on health and safety monitoring, management presentation that covers employee health and safety, sustainability report. Some examples of KPIs (Key Performance Indicators) provided on this criteria are total number of safety incidents at work, accident frequency/severity rate, total training hours or number of employees trained on health and safety issues, total number of employees trained on health and safety (e.g. stress, ergonomics). "

Comprehensive reporting on labor and human rights issues

Information

The company has provided comprehensive reporting figures or Key Performance Indicators (KPIs) on the majority of relevant labor and human rights issues.

Guidance

The company has provided good quality KPIs on the majority of labor and human rights criteria. To make the reporting figures more advanced in terms of quality, quantity and transparency, the KPIs should have all the following quality factors; (1) External assurance to assess the quality and credibility of the qualitative and quantitative information reported by the organization, (2) Alignment with reporting standards such as GRI Core/Universal/Comprehensive, SASB,...etc. (3) Materiality analysis to identify the most relevant labor and human rights issues based on the company's activity (4) The reporting timespan should be extending over 36 months for the majority of material topics and the reporting figures should not be more than 2 years old. (XS company: KPIs/reporting figures provided on at least two material labor and human rights topics which extends over a period of 24 months or more) Additionally, KPIs are reported in a formal public document available to stakeholders, and are in compliance with the Global Reporting Initiative guidelines or other external sustainability reporting standards.

Improvement Areas

Policies

Medium

Inconclusive documentation for policies on working conditions

Medium

Inconclusive documentation for policies on career management & training

Actions

High

Declares actions on diversity, equity & inclusion, but no supporting documentation available

Information

The company declares having measures on discrimination and/or harassment issues in place but there is no evidence within the supporting documentation provided by the company.

Guidance

Discrimination refers to the different treatment given to people in hiring, remuneration, training, promotion, and termination which is based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age (source: ISO 26000). Harassment (as per the US Equal Employment Opportunity Commission) refers to the unwelcome conduct based on the same criteria mentioned above. Offensive conduct may include, but is not limited to, offensive jokes, slurs, physical assaults or threats, intimidation, insults, and interference with work performance. Examples of measures might include the presence of complaint and reporting mechanisms, actions implemented for the integration of disabled people in the company, actions to promote gender and racial equality in the workplace, and awareness training on these issues. Download the How-to Guide on this topic here.

Results

Medium

Inconclusive documentation for reporting on working conditions

Information

The company does not have any formalized reporting document on employee working conditions.

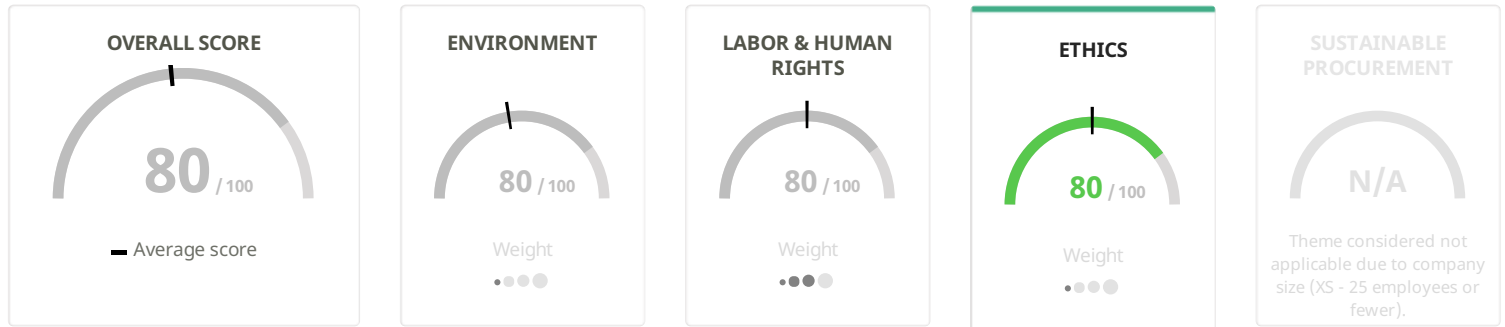
Guidance

Examples of supporting documents: annual employee benefits report or internal excel database, management presentation that includes reporting figures on employee working conditions. The document should demonstrate the following: KPIs (Key Performance Indicators) on working conditions, or the continuous monitoring of actions by your company related to employee well-being. Here are some examples of KPIs on this criteria: total or average annual remunerations, total number of leaves taken by employees, employee satisfaction rate, average working hours, overtime hours per employee.

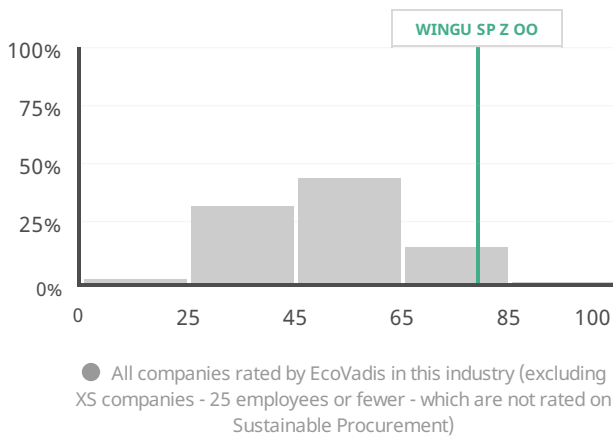
8. ETHICS

This theme focuses primarily on corruption and bribery issues, and also takes into account anticompetitive practices and responsible information management.

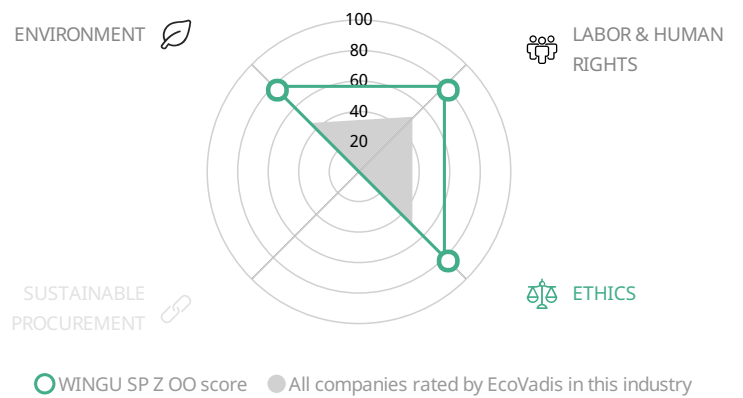
Ethics Score Breakdown



Theme score distribution



Theme score comparison



Ethics: Activated Criteria

Because the questionnaire is customized by industry, size and location, not all 21 criteria are activated for every company and some criteria are weighted more heavily than others.

Ethics: Strengths & Improvement Areas

The Corrective Action Plan is a collaborative feature designed to support companies' performance improvement. It enables companies to build an improvement plan online, communicate planned and completed corrective actions and share feedback. Improvement areas with ongoing corrective actions are marked with labels below.

Strengths

Policies

Standard policy on ethics issues

Information

The company has standard ethics policies covering some relevant ethics related topics such as corruption.

Guidance

To improve from a standard to a comprehensive environmental policy, the company should implement policies on all the relevant ethics related topics like corruption and information security. The policy should also have quality factors such as review mechanisms, detailed examples or Q&A on ethical issues, disciplinary sanctions for policy violations, signature acknowledgement of policies by employees or theme level policy targets. A policy target includes an absolute or relative quantitative achievement and a specific future deadline (from present year onwards). For example: The company is committed to train 100% of its employees on corruption by 2025.

Policy on information security

Information

The company has issued a formal standard policy that integrates commitments in the form of qualitative objectives on information security issues. The policy is formalized in a document such as a Code of Ethics and includes at least some organizational elements (e.g. review process, dedicated responsibilities, scope of application).

Guidance

It is imperative for companies who manage sensitive information to set commitments on the protection and responsible management of third-party data. The security of third party data encompasses the protection of customer personal identification information (PII) and the protection of third party intellectual property rights.

Policies on corruption

Information

There is a formal policy that integrates qualitative objectives/commitments on anti-corruption & bribery issues (including for example conflict of interest, fraud and money laundering) in the supporting documentation provided by the company.

Guidance

Corruption & bribery covers all forms of corruption issues at work namely extortion, bribery, conflict of interest, fraud, money laundering. A comprehensive policy is formalized in a standalone document or is part of a Code of Ethics/Conduct on the issues mentioned and incorporate as well some of the following elements: scope of application, allocation of responsibilities, quantitative objectives, and review mechanisms.

Actions

Whistleblower procedure for stakeholders to report information security concerns

Whistleblower procedure for stakeholders to report corruption and bribery

Awareness training to prevent information security breaches

Information

The company has delivered awareness trainings to employees on information security issues.

Guidance

Information management is the process of collecting, storing, managing and maintaining information securely in all its forms. Through the use of rigorous information management practices, companies can help maintain their credibility and confidence of consumers. Awareness or trainings on such practices are regularly conducted to ensure that employees are familiar with the company's information management policy and procedures. They may be conducted either online or in person, and should include regular testing to ensure the training effectiveness.

Measures to protect third party data from unauthorized access or disclosure

Information

The company has implemented measures to protect customer or client data from unauthorized access or disclosure.

Guidance

The company has taken measures to limit access to customer or client data within its own operation, or have implemented measures to secure its information system including such data so as to protect the data from unauthorized access or disclosure.

Awareness training performed to prevent corruption

Information

The company has implemented awareness or training program on anti-corruption and bribery issues for its employees.

Guidance

According to the ISO 26000 guideline, "Corruption can be defined as the abuse of entrusted power for private gain". There are all forms of public and proprietary corruption in the workplace, including among other things extortion, bribery, conflict of interest, fraud, money laundering. Since corruption undermines a company's effectiveness and ethical reputation, awareness or trainings on anti-corruption & bribery issues are regularly conducted to ensure that employees are familiar with the company's policy and procedures. They may be conducted either online or in person, and should include regular testing to ensure the training effectiveness.

Specific approval procedure for sensitive transactions (e.g. gifts, travel)

Information

The company has implemented a verification process for sensitive transactions.

Guidance

Sensitive transactions are a broad range of business dealings which involve higher ethics-related risks. Some examples include (non-exhaustive) gifts, travel arrangements and other types of hospitality, which are common in the business world, but may in fact constitute unethical or even illegal kickbacks, bribes or payoffs to influence decision affecting a company's operations, etc. Such transactions also comprise facilitation payments which are usually made with the intention of expediting an administrative process and may be considered as a form of corruption. As such, a verification procedure should be put in place to review and approve any sensitive transactions made by the company.

9. SUSTAINABLE PROCUREMENT (N/A)

10. 360° WATCH FINDINGS

27 Mar 2024 |

Impact on Score
Neutral →
 valid from 6 Nov 2024 to 27 Mar 2029

No records found for this company on Compliance Database

Environment
 Labor & Human Rights
 Ethics
 Sustainable Procurement

360° Watch Findings comprise relevant public information about companies' sustainability practices that have been identified via more than 10,000 data sources (including NGOs, press and trade unions). 360° Watch Findings are incorporated into the EcoVadis assessment and can have positive, negative or no score impact.

EcoVadis is connected to the following international sources:

- Sustainability networks and initiatives (e.g. AccountAbility, Business for Social Responsibility, CSR Europe)
- Trade unions and employers' organizations
- International organization (e.g. United Nations, European Court of Human Rights, Global Compact, International Labor Organization, World Bank)
- NGOs (e.g. China Labor Watch, Greenpeace, WWF, Movimento Difesa del Cittadino)
- Research institutes and specialized press (e.g. CSR Asia, Blacksmith Institute, Corpwatch)

11. SPECIFIC COMMENTS

Additional comments from our analysts pertaining to the assessment.

Specific comments

- No records found in third party risk and compliance database.

- The company demonstrates an advanced management system on environmental issues.

- The company demonstrates an advanced management system on labor & human rights issues.

- The company demonstrates an advanced management system on ethics issues.

12. CONTACT US

Any questions or need help? Visit our Help Center at support.ecovadis.com

APPENDIX:

INDUSTRY RISK PROFILE

Discover the primary sustainability risks, regulations, hot topics and best practices related to specific industries.

EcoVadis determines industry based on the International Standard Industrial Classification of All Economic Activities (ISIC), which is a compilation of all global economic activities published by the United Nations Statistical Commission. Its main purpose is to provide a set of activity categories that can be utilized for the collection and reporting of statistics according to such activities.

It is possible that a company has operations in more than one industry. In these cases, EcoVadis classifies companies based on their main area of operation, as determined by sustainability risk and/or total revenue.

CRITERIA ACTIVATION BY THEME:

Discover the primary sustainability risks, regulations, hot topics and best practices related to specific industries.

Environment

Medium	Energy consumption & GHGs
Non-activated	Water
Non-activated	Biodiversity
Non-activated	Air Pollution
Medium	Materials, Chemicals & Waste
Non-activated	Product Use
Non-activated	Product End-of-Life
Non-activated	Customer Health & Safety
Non-activated	Environmental Services & Advocacy

Labor & Human Rights

Medium	Employee Health & Safety
Medium	Working Conditions
Medium	Social Dialogue
Medium	Career Management & Training
Non-activated	Child Labor, Forced Labor & Human Trafficking
High	Diversity, Equity and Inclusion
Non-activated	External Stakeholder Human Rights

Ethics

Medium	Corruption
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Non-activated

Anticompetitive Practices

Medium

Responsible Information Management

Sustainable Procurement



Medium

Supplier Environmental Practices

Medium

Supplier Social Practices

KEY SUSTAINABILITY ISSUES

Find qualitative explanations of the key sustainability issues and risk associated with Computer programming, consultancy and related activities



Environment

Importance

Sustainability issue

Medium

Energy consumption & GHGs

Definition

Energy consumption (e.g. electricity, fuel, renewable energies) used during operations and transport. Greenhouse gases direct and indirect emissions including CO2, CH4, N2O, HFC, PFC and SF6. Also includes production of renewable energy by the company.

Industry issues

The nature of the activities in the sector requires a dependence on IT devices, significant office space, and the transport of employees. The use of energy-efficient equipment (e.g. Energy Star labelled), purchase of green/renewable power, and employee awareness programs are additional measures to consider when managing energy consumption in large commercial facilities. In order to reduce GHG emissions from transport, companies engaged in computer programming (as with all businesses) should promote the use of web-based conferencing and eco-friendly transport options for employees.

Medium

Materials, Chemicals & Waste

Definition

Consumption of all types of raw materials and chemicals. Non-hazardous and hazardous waste generated from operations. Also includes air emissions other than GHG (e.g. SOx, NOx).

Industry issues

Waste emissions in this sector, particularly IT and electronics waste, have a significant impact on the environment when not disposed of appropriately. Much of the waste that is generated through systems upgrades, including computer equipment, printer cartridges and toners are subject to stringent regulations (e.g. WEEE in Europe), and therefore should be managed effectively to regulatory compliance requirements. Additional waste streams common for companies engaged in IT related business include paper and other sources of general office waste, all of which should be recycled or disposed of safely. The collection and recycling of e-waste is important for sector sustainability; therefore, IT firms should develop internal waste management awareness programs and recycling systems.



Labor & Human Rights

Importance

Sustainability issue

Medium

Employee Health & Safety

Definition

Deals with health and safety issues encountered by employees at work i.e. during operations and transport. Includes both physiological and psychological issues arising from, among others, dangerous equipment, work practices and hazardous substance.

Industry issues

Given that companies engaged in programming, consultancy and related activities have no manufacturing activities, health and safety issues are limited to stress and psychological issues, and repetitive strain due to non-ergonomic work stations. Health and safety programs should be developed that include training employees in stress and ergonomic management to avoid high rates of employee absenteeism.

Medium

Working Conditions

Definition

Deals with working hours, remunerations and social benefits granted to employees.

Industry issues

According the PwC, given the opportunity, 64% of Millennials (and 66% of non-Millennials) would like to occasionally work from home(3). Apart from standard working conditions applicable to any activity (e.g. working hours, holidays, wages and benefits), companies engaged in computer programming and consulting activities face non-specific issues due to the manufacturing activity involving employees. Measures such as shift allowance, personal & medical insurance can be implemented to improve work/life balance by reducing the consequences of their position in their life outside of work. However, computer programming and consulting companies with operations (contracting discussed in SUP2) in identified high risk countries, particularly India where IT related industries are well developed, should certainly respect local labor laws, but adhere to international norms as they are more rigorous and supportive of workers.

Medium

Social Dialogue

Definition

Deals with structured social dialogue i.e. social dialog deployed through recognized employee representatives and collective bargaining.

Industry issues

The Global poll 2012 led by the International Trade Union Confederation (ITUC) shows that 70% of workers from 13 countries worldwide think current labor laws provide inadequate legal protection on wages and 44% think the legal framework does not ensure reasonable working hours(4). A sound and structured social dialog is thus of importance.

Medium

Career Management & Training

Definition

Deals with main career stages i.e. recruitment, evaluation, training and management of layoffs.

Industry issues

Although the computer programming sector has a skilled workforce, career management and training is a key issue to maintain a skilled workforce. Training programs should be implemented by companies to address rapid changes occurring in the IT field, particularly developments in data security and management. Human error has been blamed, by some accounts, for 35 percent of data breaches in recent years, which reaffirms the need for professional development programs in companies involved in programming(2). Additionally, career management strategies are important for both companies and employees that want to explore a broad range of fields associated with the IT field.

High

Diversity, Equity and Inclusion

Definition

Deals with discrimination and harassment prevention at the workplace. Discrimination is defined as different treatment given to people in hiring, remuneration, training, promotion, termination; based on race, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age. Harassment may include physical, psychological and verbal abuse in the work environment.

Industry issues

Promoting diversity through non-discrimination policies and practices has positive impacts on both workplace motivation and has been shown to Diversity at work on the other hand is believed to have positive impacts on companies' financial performance. When effective non-discrimination policies not in place however, companies risk financial penalties in countries that have laws and regulations prohibiting discrimination based on various personal characteristics. There is a general lack of women in the IT sector companies, therefore companies should establish proactive measures promoting additional women in the workforce(5). There is a considerable amount of international mobility in this sector; therefore, human rights impact assessments should be performed to identify regulations regarding anti-discriminatory practices in order to establish HR processes that address the issue.



Ethics

Importance

Sustainability issue

Medium

Corruption

Definition

Deals with all forms of corruption issues at work, including among other things extortion, bribery, conflict of interest, fraud, money laundering.

Industry issues

Corruption and bribery issues are major issues for any company, particularly when operating in risk countries. Regulations such as the Foreign Corrupt Practice Act (FCPA) in the US address these issues and make it unlawful to make payments to assist in obtaining or retaining business. Collusion, bribery and conflicts of interest between software manufactures/publishers and large-scale IT consultant firms can undermine sustainable IT program development goals when consultants place the interests of 3rd parties above the interests client's sustainability needs.

Medium

Responsible Information Management

Definition

Deals with third-party data protection and privacy which encompasses the protection of customer personal identification information (PII) and third party intellectual property rights.

Industry issues

Companies collect, process and share confidential information belonging to third-parties in order to operate their business. Third-party confidential information includes employee and consumer personal identification information, third parties' intellectual property, and business partner trade secrets. Companies are legally mandated in several jurisdictions to manage third party data responsibly. Breaches of third-party data, including proprietary intellectual property, trade secrets and employee and consumer PII expose companies to operational seizures, financial and reputational impacts caused by stakeholder lawsuits and regulatory penalties. The financial impacts of information security breaches can be both immediate and drawn out over several years, due to possible litigation action by parties who lost confidentiality of their information entrusted to the breached company. The costs of regulatory violations remain severe, and proposed changes to major regulatory frameworks in major countries are likely to impose greater fines. Ponemon Institute estimates the global average cost of a cyber-attack to be US\$3.86 million(6). Given the functional access that computer programmers have to customer data streams, companies engaged in computer programming must prioritize data security. Employees hired to perform computer programming are entrusted with information that can expose not only clients to IP theft, but also the clients' customers' data and IP. Investigations into recent customer data security breaches have uncovered the involvement of computer programmers in data theft schemes, though usually internal programmers(7). Companies engaged in computer programming, especially in a consultative capacity, must place an emphasis on data security and privacy in their Codes of Conduct, provide a whistle-blowing system, include data security in employee training, and update systems and processes to meet the ISO 27000 standards.



Sustainable Procurement

Importance

Sustainability issue

Medium

Supplier Environmental Practices

Definition

Deals with environmental issues within the supply chain i.e. environmental impacts generated from the suppliers and subcontractors own operations and products.

Industry issues

Due to the significant demand for IT equipment that computer programming companies maintain to perform their job functions, sustainable procurement is important for the sustainability of the industry. Companies engaged in computer programming and other IT activities rely heavily on products that have significant harmful effects on the environment throughout the life cycles of the products. Computer upgrades should therefore take into account environmental impacts by purchasing equipment that has a higher quantity of recyclable parts, low emissions of noise and radiation, and packaging that is easily recyclable or reusable. When available for specific products, companies can verify the specifications and eco-impacts through certification bodies (e.g. Energy-Star).

Medium

Supplier Social Practices

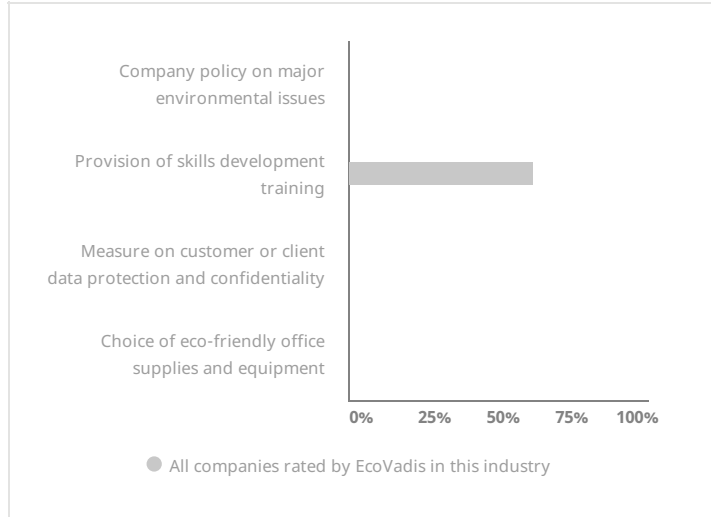
Definition

Deals with labor practices and human rights issues within the supply chain i.e. labor practices and human rights issues generated from the suppliers and subcontractors own operations or products.

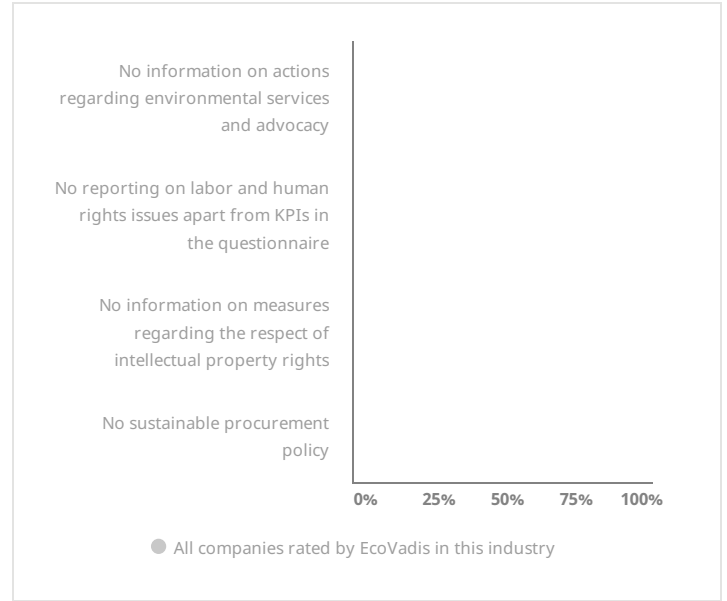
Industry issues

The manufacturing process of electronics has, for many years, been a source of substantial labor and human rights abuses, particularly in identified high risk countries. Factory workers are exposed to hazardous chemicals and dangerous machinery that, when located in identified high risk countries, is neglected due to weak local health and safety regulations. To exacerbate the situation at this level of the electronics supply chain, most of the manufacturing for this sector is performed in identified high risk countries. While industry initiatives (notably the Electronics Industry Citizen Coalition) have been developed with the goal of eradicating labor and human rights abuses, issues still remain that require the attention of companies engaged in the IT programming sector in order to gain visibility of their supply chains. External are effective information gathering tools, as are the collaborative efforts to promote whistle-blowing systems.

Key industry Strengths



Key industry Improvement Areas



Sustainability KPIs Overview

KPI	All companies rated by EcoVadis in this industry
Audit or assessment of suppliers on CSR issues	34%
Carbon disclosure project (CDP) respondent	10%
Global Compact Signatory	12%
Grievance mechanism or whistleblowing procedure in place	29%
ISO 14001 certified (at least one operational site)	34%
ISO 45001 certification or equivalent (at least one operational site)	22%
Policy on sustainable procurement issues	34%
Reporting on energy consumption & GHGs	44%
Reporting on health & safety indicators	31%

Main Regulations and Initiatives

Certification 80 PLUS

<http://www.80plus.org/>


80 PLUS is an electric utility-funded incentive program to integrate more energy-efficient power supplies into desktop computers and servers.

 **Environment**

Label de responsabilité sociale des call centers - Association Française de la Relation Client

<http://www.afrc.org/pageLibre000100d4.php>

Ce "label responsabilité sociale" propose une alternative à une logique axée sur la recherche systématique d'optimisation des coûts.

 **Labor & Human Rights**

The Green Grid

<http://www.thegreengrid.org/>

The Green Grid Association is a 501(c)6 non-profit, open industry consortium of end users, policy makers, technology providers, facility architects, and utility companies that works to improve the resource efficiency of information technology and data centers throughout the world. With more than 175 member companies around the world, The Green Grid seeks to unite global industry efforts, create a common set of metrics, and develop technical resources and educational tools to further its goals.

 **Environment**

ISACA - Code of Professional Ethics

<http://www.isaca.org/Certification/Code-of-Professional-Ethics/Pages/default.aspx>

ISACA is a global network of more than 100,000 members covering a variety of professional IT-related positions. ISACA sets forth a Code of Professional Ethics to guide the professional and personal conduct of members of the association and/or its certification holders.

 **Ethics**

Universal Declaration of Human Rights

<http://www.un.org/Overview/rights.html>

 Regulatory

The Universal Declaration of Human Rights (UDHR) is an advisory declaration adopted by the United Nations General Assembly (10 December 1948)

 **Labor & Human Rights**

EU directive EuP (Energy using Products)

https://ec.europa.eu/growth/industry/sustainability/sustainable-product-policy-ecodesign_en

 Regulatory

The directive 2005/32/EC became law in the European Union on August 2005. The EuP Directive focus on the design phase to improve energy efficiency of energy using products.

 **Environment**

Label Energy Star

<http://www.energystar.gov/>


Energy star is a voluntary labeling program designed to identify and promote energy efficient products. It was first created as a United States government program, but Australia, Canada, Japan, New Zealand, Taiwan and the European Union have also adopted the program.

 **Environment**

Charte de la diversité en entreprise (French Diversity Charter)

<http://www.diversity-charter.com/>

The Diversity Charter is a written commitment that can be signed by any company, regardless of its size, that wishes to ban discrimination in the workplace and makes a decision to work towards creating diversity.

 **Labor & Human Rights**

Standard ISO 14000 (International Standard Organisation)

http://www.iso.org/iso/iso_14000_essentials

The ISO 14000 family addresses various aspects of environmental management


 **Environment**

International Labor Organization's Fundamental Conventions

http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_095895.pdf

 Regulatory

The Governing Body of the International Labour Office has identified eight Conventions as fundamental to the rights of human beings at work. These rights are a precondition for 12 the others in that they provide a necessary framework from which to strive freely for the improvement of individual and collective conditions of work.

 **Labor & Human Rights**

Standard OHSAS 18001 (Occupational Health and Safety Assessment Series)

<http://www.ohsas-18001-occupational-health-and-safety.com/index.htm>

OHSAS 18000 is an international occupational health and safety management system specification.

 **Labor & Human Rights**

United Nations Convention against Corruption (UNCAC)

<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

 Regulatory

The UNCAC is the first leg12y binding international anti-corruption instrument. In its 8 Chapters and 71 Articles, the UNCAC obliges its States Parties to implement a wide and detailed range of anti-corruption measures affecting their laws, institutions and practices.

 **Ethics**

OECD guidelines for multinational enterprises

http://www.oecd.org/about/0,2337,en_2649_34889_1_1_1_1_1,00.html

The Guidelines are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide voluntary principles and standards for responsible business conduct in a variety of areas including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition, and taxation.

 **All themes**

Standard ISO 26000 (International Standard Organisation)

<http://www.iso.org/iso/pressrelease.htm?refid=Ref972>

The future International Standard ISO 26000, Guidance on social responsibility, will provide harmonized, glob12y relevant guidance based on international consensus among expert representatives of the main stakeholder groups and so encourage the implementation of best practice in social responsibility worldwide.

 **All themes**

Foreign Corrupt Practices Act of 1977

<http://www.usdoj.gov/criminal/fraud/fcpa/>

 Regulatory

The Foreign Corrupt Practices Act of 1977 (FCPA) prohibits payments, gifts, or Practices Act contributions to officials or employees of any foreign government or government-owned business for the purpose of getting or retaining business.

 **Ethics**

United Nations Global Compact (10 principles)

<http://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html>

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of ten principles in the areas of human rights, labour standards, the environment, and anti-corruption:

 **All themes**

Standard Global Reporting Initiative's (GRI)

<http://www.globalreporting.org/Home>

The GRI is a network-based organization, that has set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance.

 **All themes**

Carbon disclosure project

<https://www.cdp.net>

CDP is an international, not-for-profit organization providing the only global system for companies and cities to measure, disclose, manage and share vital environmental information.

 **Environment**

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